

# **EPA Jacket 71297-3**

## **Vol.2**



# Material Sent for Data Extraction

Reg. # 71297Description: SMART FRESH SMARTABS☒ Material(s) Sent to Data Extraction Contractors:☐ New Stamped Label Dated \_\_\_\_\_☒ Notification Dated 6/13/2012☐ New CSF(s) Dated \_\_\_\_\_☐ Other: \_\_\_\_\_☐ Decision #: \_\_\_\_\_☐ Other Action/Comments: \_\_\_\_\_  
\_\_\_\_\_

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Sylvester GeorgePhone: (703) 603-0688 Division: BPRDDate: 6/19/2012





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 19, 2012

Agro Fresh, Inc.  
727 Norristown Road  
Spring House, PA 19477-0904  
Attn: Ann Beaulieu

*Done  
SFG*

Subject: Notification – Alternate Brand Name per PR Notice 98-10  
**Product Brand Name: SmartFresh SmartTabs**  
**Alternate Brand Name: RipeLock™ Tabs**  
EPA Reg. No. 71297-3  
Your Submission dated June 13, 2012

Dear Ms. Beaulieu:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notice (PRN) 98-10 dated above. A screen of this request has been conducted for its applicability under PRN 98-10, and it has been determined that the action(s) requested falls within the scope of this Notice. Our records have been duly noted, and the label submitted with this application has been stamped "Notification Accepted" and will be placed accordingly in our records.

Three (3) copies of final printed labeling must be submitted to the Agency before your product as modified, may be sold or distributed [PR Notice 82-2 and 40 CFR 156.10(a) (6)].

If you have any questions regarding this action, you may contact Mr. Sylvester George at (703) 603-0688 or via e-mail at [george.sylvester@epa.gov](mailto:george.sylvester@epa.gov).

Sincerely,

*Linda A. Hollis*

Linda A. Hollis, Chief  
Biochemical Pesticide Branch  
Biopesticides and Pollution  
Prevention Division (7511P)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 19, 2012

Agro Fresh, Inc.  
727 Norristown Road  
Spring House, PA 19477-0904  
Attn: Ann Beaulieu

Subject: Notification - Alternate Brand Name per PR Notice 98-10.

Product Brand Name: **SmartFresh SmartTabs.**  
Alternate Brand Name: **RipeLock™ Tabs.**  
EPA Reg. No: 71297-3.  
Your Submission dated June 13, 2012.

Dear Ms. Beaulieu:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration Notice (PRN) 98-10 dated above. A screen of this request has been conducted for its applicability under PRN 98-10, and it has been determined that the action requested falls within the scope of this Notice. Our records have been duly noted, and the application, (EPA Form 8570-1) has been stamped "Notification Accepted" and will be placed accordingly in our records.

Three (3) copies of final printed labeling must be submitted to the Agency before your product as modified, may be sold or distributed [PR Notice 82-2 and 40 CFR 156.10(a) (6)].

If you have any questions regarding this action, you may contact Mr. Sylvester George at (703) 603-0688 or via e-mail at [george.sylvester@epa.gov](mailto:george.sylvester@epa.gov).

Sincerely,

*Linda A. Hollis*

Linda A. Hollis, Chief  
Biochemical Pesticide Branch  
Biopesticides and Pollution  
Prevention Division (7511P)



# Receipt for Section 3

S: **918718** Resubmission: ☐ Yes ☒ No  
Regulatory Type: **Product Registration - Section 3** Fee For Service: ☐ Yes ☒ No  
Application Type: **Notification**  
Company: **71297 AGRO FRESH INC.** **V**

Print Letter  
Enter More Information  
Tracking

Risk Manager: **Biologicals & Pollution Prevention Division, PM Team 91**

Product #: **71297-3** Product Name: **SMARTFRESH SMARTTABS**

Override#:

Me Too Section3:  Me Too Product Name:

Application Date: **13-Jun-2012** **id** OPP Rec'd Date: **18-Jun-2012** **id**  
Front End Date: **18-Jun-2012** **id** Risk Manager Send Date: **19-Jun-2012** **id**  
FFS Due Date:  Negotiated Due Date:   
OPP Target Date:

Receipt Content	Des
Other	Cvr ltr. dtd. 6/13/12

Fast Track: ☐ New Ingredient: ☐

Receipt Description:

Notif. alt brand name: **"Ripelock Tabs"**

New Ingredient Request Date:   
New Ingredient Received Date:   
Signature Date:

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

View/Edit

Rec'd  
6-19-12  
AB  
5



June 13, 2012

## Notification Accepted

Date: 6/19/2012

Reviewer: Sylvester George

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
Biopesticides and Pollution Prevention Division  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

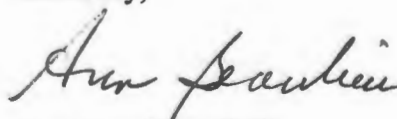
Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Subject: Notification of Alternate Brand Name per Notice 98-10  
EPA Registration Number 71297-3  
Product: SmartFresh SmartTabs  
Active Ingredient = 1-methylcyclopropene

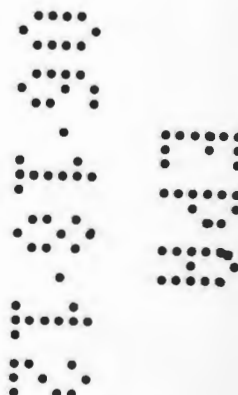
This is a notification to add an alternate brand name for SmartFresh<sup>TM</sup> SmartTabs. The alternate brand name is RipeLock<sup>TM</sup> Tabs. The primary brand name remains SmartFresh<sup>TM</sup> SmartTabs.

This change is being made by notification and is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Sincerely,



Ann Beaulieu, Ph.D.  
Director, Regulatory Affairs







United States  
**Environmental Protection Agency**  
 Washington, DC 20460

Registration	OPP Identifier Number
Amendment	
<input checked="" type="checkbox"/> Other	

### Application for Pesticide - Section I

Company/Product Number agroFresh, Inc. / 71297-3	2. EPA Product Manager Linda Hollis	3. Proposed Classification  None X Restricted
Company/Product (Name) SmartFresh™ SmartTab	PM#	
Name and Address of Applicant (Include Zip Code) agroFresh Inc./Rohm and Haas Company 7 Norristown Road Spring House, PA 19477-0904	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name	

### Section - II

Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated	<b>Notification Accepted</b>
Notification - Explain below.	<input type="checkbox"/> "Me Too" Application. Other - Explain below.	

Date: 6/19/2012

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Reviewer: Sylvester George

This notification is to add the alternate brand name RipeLock Tabs to SmartFresh SmartTabs, which remains the primary brand name.

### Section - III

<b>Material This Product Will Be Packaged In:</b>					
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			Other _____		

### Section - IV

Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann Beaulieu	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 215-619-5534
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
Signature Ann Beaulieu	Director, Regulatory Affairs	
Typed Name Ann Beaulieu	5. Date June 13, 2012	



# MATERIAL TO BE ADDED TO JACKET

REG #: 71297-3

Description: Label Notification - Accepted

if applicable, check all that are attached:		Send to CSC
<input type="checkbox"/>	new stamped accepted label	
<input type="checkbox"/>	new CSF	
<input checked="" type="checkbox"/>	notification	
<input checked="" type="checkbox"/>	other: Alternate Brand Name: "SmartFresh RipeLock Tab"	

## Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding the material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be placed in the appropriate bin.

Reviewer: Colin Walsh

Date: 6/27/2011

Phone: (703) 308-0298

Division: BPPD





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 27, 2011

Ann Beaulieu, Ph.D.  
AgroFresh, Inc.  
727 Norristown Road  
P.O. Box 904  
Spring House, PA 19477

Subject: Application for Label Notification to add the alternate brand name "SmartFresh RipeLock Tabs".  
Product Name: SmartFresh SmartTabs  
EPA Reg. No.: 71297-3  
Your submission dated June 7, 2011  
Decision Number: 450457

Dear Dr. Beaulieu:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under PR Notice 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PR Notice 98-10 and it has been determined that the action(s) requested falls within the scope of PR Notice 98-10. Our records have been duly noted and the application has been stamped "Notification Accepted" and will be placed accordingly in our records.

If you have any questions concerning this action, please feel free to contact Mr. Colin Walsh at (703) 308-0298 or via email at [walsh.colin@epa.gov](mailto:walsh.colin@epa.gov).

Sincerely,

*Linda A. Hollis*

Linda A. Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention  
Division (7511P)



S: 397558 Resubmission: ☐ Yes ☒ No  
Regulatory Type: Product Registration - Section 3 Fee For Service: ☐ Yes ☒ No  
Application Type: Notification  
Company: 71297 AGRO FRESH INC. V

Print Letter

Enter More Information

Tracking

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91Product #: 71297-3 Product Name: SMARTFRESH SMARTTABSOverride#: Me Too  Me Too   
Section3:  Product Name: Application Date: 07-Jun-2011 ie OPP Rec'd Date: 10-Jun-2011 ieFront End Date: 10-Jun-2011 ie Risk Manager Send Date: 10-Jun-2011 ieFFS Due Date:  Negotiated Due Date: OPP Target Date: Fast Track: ☐ New Ingredient: ☐

Receipt Description:

Notification is to add the Alternate Brand Name SmartFresh Ripelock Tabs to SmartFresh Smarttabs.

New Ingredient Request Date: New Ingredient Received Date: Form A: ☐ Signature Date: Form B: ☐ Signature Date: 

Receipt Content

Des

Other

Notification to add alte

View/Edit

Rec'd  
6/24/11  
HB





June 7, 2011

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
Biopesticides and Pollution Prevention Division  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Subject: Notification of Alternate Brand Name per Notice 98-10  
EPA Registration Number 71297-3  
Product: SmartFresh SmartTabs  
Active Ingredient = 1-methylcyclopropene

This is a notification to add an alternate brand name for SmartFresh™ SmartTabs. The alternate brand name is SmartFresh™ RipeLock™ Tabs. The primary brand name remains SmartFresh™ SmartTabs.

This change is being made by notification and is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Sincerely,

Ann Beaulieu, Ph.D.  
Director, Regulatory Affairs







United States  
Environmental Protection Agency  
Washington, DC 20460

Registration	OPP Identifier Number
Amendment	
Other	

**Application for Pesticide - Section I**

Company/Product Number SmartFresh, Inc. / 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification None X Restricted
Company/Product (Name) SmartFresh™ SmartTab	PM#	
Name and Address of Applicant (Include Zip Code) SmartFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name	<b>Notification Accepted</b> <b>Date: JUN 27 2011</b>

**Section - II**

Reviewer: C. Walsh

Amendment - Explain below.

- ☐ Final printed labels in response to Agency letter dated \_\_\_\_\_
- ☐ "Me Too" Application.

Notification - Explain below.

Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

This notification is to add the alternate brand name SmartFresh RipeLock Tabs to SmartFresh SmartTabs, which remains the primary brand name.

**Section - III****Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per container Unit Packaging wgt.	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per container Package wgt.	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack
Certification must be submitted			
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	

Manner in Which Label is Affixed to Product

- ☐ Lithograph  
☒ Paper glued  
☐ Stenciled

Other \_\_\_\_\_

**Section - IV**

Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name John Beaulieu	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 215-619-5534
-----------------------	---------------------------------------	---

**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>John Beaulieu</i>	Director, Regulatory Affairs	6. Date Application Received (Stamped) JUN 27 2011
Typed Name John Beaulieu	5. Date June 7, 2011	



# MATERIAL TO BE ADDED TO JACKET

REG #: 11297-3

Description: Smartfresh Smarttabs

if applicable, check all that are attached:		Send to CSC
<input type="checkbox"/>	new stamped accepted label	
<input type="checkbox"/>	new CSF	
<input checked="" type="checkbox"/>	notification ( <u>Applicant withdrew</u> <u>Notburton Application 12/13</u> )	
<input type="checkbox"/>	other:	

## Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding the material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be placed in the appropriate bin.

Reviewer: Menyon Adams Date: DEC 14 2010

Phone: (703) 347-8496 Division: BPPD



Notification Not Accepted

Date: DEC 14 2010  
Reviewer: M Adams  
Amendment Recommended:

Applicant withdrew  
Notification Application  
12/10/10

**MASTER LABEL**

**SmartFresh™ SmartTabs**

Powered by 1-MCP

Sublabel A: Commercial ornamental

Sublabel B: Fruit and Vegetables (Non-Agricultural Use)

**ACTIVE INGREDIENT:**

1-Methylcyclopropene: .....0.63%

OTHER INGREDIENTS: .....99.37%

Total: .....100.0%

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

Manufactured by:

AgroFresh, Inc.

A Subsidiary of Rohm and Haas Company

100 Independence Mall

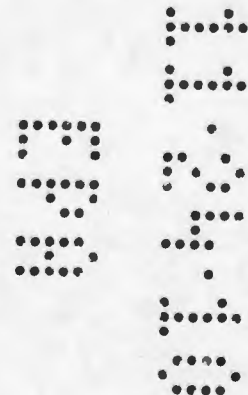
Philadelphia, PA 19106

1-215-592-3000

EPA Reg. No. 71297-3

EPA Est. No. 707-WA-001

Lot No.





SUBLABEL A: Commercial ornamental

<b>SmartFresh™ SmartTabs</b>	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
----------------------------------	---

Powered by 1-MCP

Protects ornamentals from the various effects of ethylene.

**Active Ingredient:**

1-Methylcyclopropene.....0.63%

**Other Ingredients:** ..... 99.37%

**Total:** ..... 100.0%

**Keep Out Of Reach Of Children**

**CAUTION**

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

<b>FIRST AID</b>	
<b>If inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15- 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice</li></ul>
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>HOTLINE</b> <b>1-215-592-3000</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Rohm and Haas at 215-592-3000 for emergency medical treatment information twenty four (24) hours a day, seven (7) days a week.	

**EPA REGISTRATION NO. 71297-3**

**EPA EST. NO. 707-WA-001**

71297-3 SmartFresh™ SmartTab  
Last label notification November 22, 2010  
Page 2 of 16



### Net Contents:

Tablets	Ounces	Grams	Tablets	Ounces	Grams	Tablets	Ounces	Grams
1	0.044	1.25	11	0.484	13.75	21	0.924	26.25
2	0.088	2.5	12	0.528	15	22	0.968	27.5
3	0.132	3.75	13	0.572	16.25	23	1.012	28.75
4	0.176	5	14	0.616	17.5	24	1.056	30
5	0.22	6.25	15	0.66	18.75	25	1.1	31.25
6	0.264	7.5	16	0.704	20	26	1.144	32.5
7	0.308	8.75	17	0.748	21.25	27	1.188	33.75
8	0.352	10	18	0.792	22.5	28	1.232	35
9	0.396	11.25	19	0.836	23.75	29	1.276	36.25
10	0.44	12.5	20	0.88	25	30	1.32	37.5

Lot No.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and other handlers must follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### User Safety Recommendations

- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.



## Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in the box only apply to uses of this product that are covered by the Worker Protection Standard.

**REI:** Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment area. For enclosed areas including but not limited to storage rooms, coolers, shipping containers, enclosed truck trailers, ventilation shall continue until after thirty minutes (30) minutes of using fans or other mechanical ventilating system. In greenhouses, two (2) hours of ventilation using fans or other mechanical ventilating systems or four (4) hours of ventilation using vents, windows or other passive ventilation.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, prior to venting the volatile active ingredient from the treatment area is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.



## Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

REI: Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment area. For enclosed areas including but not limited to storage rooms, coolers, shipping containers, enclosed truck trailers, ventilation shall continue until after thirty minutes (30) minutes of using fans or other mechanical ventilating system. In greenhouses, two (2) hours of ventilation using fans or other mechanical ventilating systems or four (4) hours of ventilation using vents, windows or other passive ventilation.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

## DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.



## PRODUCT INFORMATION

SmartFresh™ is a unique tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on ornamentals, including fresh cut flowers, potted flowers, bedding, nursery and foliage plants. By counteracting ethylene, SmartFresh™ provides many benefits to ornamentals during transport and storage including:

- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying senescence
- Reducing chilling injury
- Reducing premature flower death
- Reducing premature leaf and flower drop and leaf yellowing

SmartFresh™ is used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions.

Ornamentals must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

## Cut Flowers, Potted Flowers, Bedding, Nursery and Foliage Plants

SmartFresh™ treatment benefits many flowers and plants such as, but not limited to:

Achillea, Aconitum, Agapanthus, Alchemilla, Allium, Alstroemeria, Alyssum, Aphelandra, Aquilegia, Asclepias, Astrantia, Asparagus fern, Azalea, Begonia, Bouvardia, Brassia (Schefflera), Brodiaea (Triteleia), Calathea, Campanula, Carnation, Celosia, Centaurea, Chamaedorea, Chelone, Coleus, Cordyline, Cymbidium, Crocosmia (Montbretia), Daucus (Queen Annes Lace), Delphinium, Dendrobium, Dianthus, Dicentra, Dizygotheca, Doronicum, Echium, Eremurus, Eustoma, (Lisianthus), Ficus, Freesia, Fuchsia, Geranium, Gladiolus, Godetia, Gypsophila, Hibiscus, Ilex (Holly), Impatiens, Ixia, Kalanchoe, Kniphofia, Lavatera, Lily, Lysimachia, Miniature Carnation, Monkshood, Pelargonium, Petunia, Philodendron, Phlox, Physostegia, Poinsettia, Radermachera, Rose, Rudbeckia, Salvia, Saponaria, Scabiosa, Silene, Snapdragon, Solidaster, Stock, Streptocarpus, Sweet William, Trachelium, Trollius, Veronica, Wax Flower, and Zygocactus.



## Timing of application

SmartFresh™ is used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. Flowers and plants are treated whether or not they may have been previously treated with SmartFresh or another anti-ethylene product. Additional applications are beneficial for prolonged storage periods and for some species with more than one flower per stem (i.e. snapdragons, delphiniums, miniature carnations, and alstromeria) and flowers at different stages of development on the same plant (i.e. geraniums, impatiens, and azaleas).

Plants being held for shipment in enclosed areas are easily treated with SmartFresh™. For example, non-boxed sleeved potted plants and cut flowers (held dry or in solution), or boxed plants and cut flowers with the lids and/or precooling vents completely open and directly exposed to the surrounding atmosphere can be treated. Bedding or potted plants on movable racks are also easily treated.

## Application Method and Rate

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be 10 x 20 x 12 = 2400 cubic feet. To calculate the height measurement for greenhouses with a peaked roof, use one half of the sum of the height at the peak plus the height at the wall.

b) Choose the correct number of **Green** SmartFresh™ SmartTabs according to the size of the area as follows.

Use one GREEN tablet per 150 cubic feet of treatment area or  
For 20 foot truck container use 7 GREEN tablets  
For 40 foot truck container use 14 GREEN tablets

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.  
**Always use two (2) Blue tablets for EACH Activator Kit.**



## Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container/Greenhouse

To be used with SmartFresh™, rooms/containers/trailers/greenhouses must be gas tight and have an internal fan for mixing the atmosphere.

### Check that:

- All room/trailer/container/greenhouse drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber      No large cracks
  - No plastic slat doors      No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

## Step 3: Fill the treatment room with the ornamentals to be treated

## Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.  
**Always use both Blue tablets.**
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST four (4) hours for ornamentals treated at >55F and for at least ten (10) hours for ornamentals treated at or below 55F.

## Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated area by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. For greenhouses, vent the treated area by opening doors and windows for a minimum of two hours with continued full internal ventilation or four hours with passive ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal



facility. Store treated ornamentals not intended for immediate sale according to standard commercial practices.

## Restrictions

Do not split tablets. Use whole tablets only.

Do not smoke during the SmartFresh™ application.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Triple rinse of equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### WARRANTY AND DISCLAIMER

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. To the extent permitted by applicable law, risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

*SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company*  
U.S. Patents 5,518,988, 6,017,849 and 6,762,153

**AgroFresh Inc.**  
**A Fully-Owned Subsidiary of Rohm and Haas Company**  
**100 Independence Mall West**  
**Philadelphia, PA. 19106**  
**(215) 592-3000**



SUBLABEL B: Fruit and vegetables

<b>SmartFresh™ SmartTabs</b>	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
----------------------------------	---

Protects harvested fruit and vegetables from the various effects of ethylene.

**Active Ingredient:**

1-Methylcyclopropene.....0.63%

**Other Ingredients:** ..... 99.37%

**Total:** ..... 100.0%

**Keep Out Of Reach Of Children**

## CAUTION

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

FIRST AID	
<b>If inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15- 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice</li></ul>
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>HOTLINE</b> <b>1-215-592-3000</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Rohm and Haas at 215-592-3000 for emergency medical treatment information twenty four (24) hours a day, seven (7) days a week.	

**EPA REGISTRATION NO. 71297-3**

**EPA EST. NO. 707-WA-001**



### Net Contents:

Tablets	Ounces	Grams	Tablets	Ounces	Grams	Tablets	Ounces	Grams
1	0.044	1.25	11	0.484	13.75	21	0.924	26.25
2	0.088	2.5	12	0.528	15	22	0.968	27.5
3	0.132	3.75	13	0.572	16.25	23	1.012	28.75
4	0.176	5	14	0.616	17.5	24	1.056	30
5	0.22	6.25	15	0.66	18.75	25	1.1	31.25
6	0.264	7.5	16	0.704	20	26	1.144	32.5
7	0.308	8.75	17	0.748	21.25	27	1.188	33.75
8	0.352	10	18	0.792	22.5	28	1.232	35
9	0.396	11.25	19	0.836	23.75	29	1.276	36.25
10	0.44	12.5	20	0.88	25	30	1.32	37.5

Lot No.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and other handlers must follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### User Safety Recommendations

- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.



## Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

REI: Thirty (30) minutes

Do not enter enclosed areas until the enclosed area has been vented unless wearing the appropriate PPE. Ventilation shall continue until after thirty (30) minutes of ventilation using fans or other mechanical ventilating systems.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

## DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

## PRODUCT INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples



- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ is used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

## **Fruit And Vegetables**

### **Storage Conditions**

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

### **Timing of Application**

SmartFresh™ is added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. For best results, do not use with fruit previously treated with Ethephon. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. Fruit and vegetables may benefit from repeat application, such as when the crop has been exposed to ethylene. It must be emphasized that keeping the fruit and vegetables cool at all times and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage. Only one application to the same fruit.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.



Kiwifruit: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Persimmons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Pears, Asian pears: Apply SmartFresh™ as soon after harvest as possible.

Peaches, nectarines, plums, plumcots, and apricots: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

## Application Method and Rate

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be 10 x 20 x 12 = 2400 cubic feet.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs according to the size of the area and the commodity to be treated as follows.

Apple, Asian pear, avocado, broccoli:

Use one GREEN tablet per 120 cubic feet of treatment area

Pear: Use one GREEN tablet per 200 cubic feet of treatment area.

Melon, tomato, kiwifruit, persimmon, peach, nectarine, plum, plumcot, apricot:

Use one GREEN tablet per 240 cubic feet of treatment area

Bananas: Use one GREEN tablet per 380 cubic feet of treatment area

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

**Always use two (2) Blue tablets for EACH Activator Kit.**

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container



To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

**Check that:**

- All room/trailer/container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber      No large cracks
  - No plastic slat doors      No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables, to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.  
**Always use both Blue tablets.**
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours for avocado, banana, broccoli, kiwifruit, melon, persimmon and tomato, fifteen (15) hours for Asian pear, twenty four (24) hours for apple, nectarine, peach, pear, plum, plumcot and apricot.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twenty four (24) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated



commodities not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

## Restrictions

Do not split tablets. Use whole tablets only.

Do not smoke during the SmartFresh™ application.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Triple rinse of equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### WARRANTY AND DISCLAIMER

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. To the extent permitted by applicable law, risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

*SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company*  
U.S. Patents 5,518,988, 6,017,849 and 6,762,153

**AgroFresh Inc.**  
**A Fully-Owned Subsidiary of Rohm and Haas Company**  
**100 Independence Mall West**  
**Philadelphia, PA. 19106**  
**(215) 592-3000**

71297-3 SmartFresh™ SmartTab  
Last label notification November 22, 2010  
Page 16 of 16





December 9, 2010

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Re: SmartFresh™ SmartTab  
EPA Registration Number 71297-3

EthylBloc™ Sachet  
EPA Registration Number 71297-5

Active Ingredient = 1-methylcyclopropene  
Withdrawal of Notification of Label Change on November 22, 2010

We withdraw our request for addition of a formulation descriptor that was requested on November 22, 2010 for both 71297-3 and 71297-5.

If you have any questions, please contact me at 215-619-5534 or [abeaulieu@agrofresh.com](mailto:abeaulieu@agrofresh.com). Thank you.

Sincerely,

A handwritten signature in cursive script, reading "Ann Beaulieu".

Ann Beaulieu  
Director, Regulatory Affairs



# Receipt for Section 3

S: 886653

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Notification

Company: 71297 AGRO FRESH INC.



Print Letter

Enter More Information

Tracking

Risk Manager: Biologicals &amp; Pollution Prevention Division, PM Team 91

Product #: 71297-3

Product Name: SMARTFRESH SMARTABS

Override#:

Me Too  
Section3:Me Too Product  
Name:

Application Date: 22-Nov-2010



OPP Rec'd Date: 29-Nov-2010



Front End Date: 29-Nov-2010



Risk Manager Send Date: 02-Dec-2010



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐New Ingredient: ☐

Receipt Description:

Notification.

Receipt Content

Des

Other

Notification.

View/Edit

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

VCA plus/10

Rec'd  
ACB  
12/3/10  
31





November 22, 2010

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Re: SmartFresh™ SmartTab  
EPA Registration Number 71297-3  
Active Ingredient = 1-methylcyclopropene  
Notification of Label Change per PR Notice 98-10

A formulation descriptor has been added to this label as allowed under PR Notice 98-10.

Enclosed please find a copy of the modified label with the change highlighted and in red font.

If you have any questions, please contact me at 215-619-5534 or [abeaulieu@agrofresh.com](mailto:abeaulieu@agrofresh.com). Thank you.

Sincerely,

Ann Beaulieu  
Director, Regulatory Affairs

enclosures







United States  
Environmental Protection Agency  
Washington, DC 20460

Registration

OPP Identifier Number

Amendment

X

Other

## Application for Pesticide - Section I

1. Company/Product Number AgroFresh, Inc. / 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification  None X Restricted
4. Company/Product (Name) SmartFresh™ SmartTab	PM# 91	
5. Name and Address of Applicant (Include Zip Code) AgroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No.  Product Name	

## Section - II

Amendment - Explain below.

☐

Final printed labels in response to

☐Agency letter dated  
"Me Too" Application.

Notification - Explain below.

Other - Explain below.

Notification Not Accepted

DEC 14 2010

Date:

Reviewer: M Adams

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

I update label to include formulation descriptor per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

## Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container	
Certification must be submitted			
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product
Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		Other	

## Section - IV

Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Van Beaulieu	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 215-619-5534
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received  (Stamped)
Signature 	Director, Regulatory Affairs	
Typed Name Van Beaulieu	5. Date November 22, 2010	



# MATERIAL TO BE ADDED TO JACKET

REG #: 71297-3

Description: Notification - Accepted

if applicable, check all that are attached:		Send to CSC
<input type="checkbox"/>	new stamped accepted label	
<input type="checkbox"/>	new CSF	
<input checked="" type="checkbox"/>	notification	
<input type="checkbox"/>	other:	

## Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding the material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be placed in the appropriate bin.

Reviewer: Colin Walsh

Date: 7/29/2010

Phone: (703) 308-0298

Division: BPPD





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

July 29, 2010

Ann Beaulieu  
AgroFresh, Inc./Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, PA 19106-2399

RE: Product Name: SmartFresh SmartTabs  
EPA Reg. No.: 71297-3  
Application for Label Notification dated July 19, 2010 to update the  
storage and disposal statement per Pesticide Registration (PR) Notice  
2007-4 and add an additional U.S. patent number.

Dear Ms. Beaulieu:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under PR Notice 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PR Notice 98-10 and it has been determined that the action(s) requested falls within the scope of PR Notice 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification Accepted" and will be placed accordingly in our records.

If you have any questions concerning this action, please feel free to contact Mr. Colin Walsh at (703) 308-0298 or via email at [walsh.colin@epa.gov](mailto:walsh.colin@epa.gov).

Sincerely,

*Linda A. Hollis*

Linda A. Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention  
Division (7511P)



# MASTER LABEL

## SmartFresh™ SmartTabs

Sublabel A: Commercial ornamental

Sublabel B: Fruit and Vegetables (Non-Agricultural Use)

### ACTIVE INGREDIENT:

1-Methylcyclopropene: .....0.63%

OTHER INGREDIENTS:.....99.37%

Total: .....100.0%

### Notification Accepted

Date: JUL 29 2010

Reviewer: C. Walsh

KEEP OUT OF REACH OF CHILDREN

### CAUTION

Manufactured by:

AgroFresh, Inc.

A Subsidiary of Rohm and Haas Company

100 Independence Mall

Philadelphia, PA 19106

1-215-592-3000

EPA Reg. No. 71297-3

EPA Est. No. 707-WA-001

Lot No.





SUBLABEL A: Commercial ornamental

<b>SmartFresh™ SmartTabs</b>	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
----------------------------------	---

Protects ornamentals from the various effects of ethylene.

**Active Ingredient:**

1-Methylcyclopropene.....0.63%

**Other Ingredients:** ..... 99.37%

**Total:** ..... 100.0%

**Keep Out Of Reach Of Children**

## CAUTION

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

FIRST AID	
<b>If inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15- 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice</li></ul>
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>

**HOTLINE**  
**1-215-592-3000**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Rohm and Haas at 215-592-3000 for emergency medical treatment information twenty four (24) hours a day, seven (7) days a week.

**EPA REGISTRATION NO. 71297-3**  
**EPA EST. NO. 707-WA-001**



### Net Contents:

Tablets	Ounces	Grams	Tablets	Ounces	Grams	Tablets	Ounces	Grams
1	0.044	1.25	11	0.484	13.75	21	0.924	26.25
2	0.088	2.5	12	0.528	15	22	0.968	27.5
3	0.132	3.75	13	0.572	16.25	23	1.012	28.75
4	0.176	5	14	0.616	17.5	24	1.056	30
5	0.22	6.25	15	0.66	18.75	25	1.1	31.25
6	0.264	7.5	16	0.704	20	26	1.144	32.5
7	0.308	8.75	17	0.748	21.25	27	1.188	33.75
8	0.352	10	18	0.792	22.5	28	1.232	35
9	0.396	11.25	19	0.836	23.75	29	1.276	36.25
10	0.44	12.5	20	0.88	25	30	1.32	37.5

Lot No.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and other handlers must follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### User Safety Recommendations

- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.



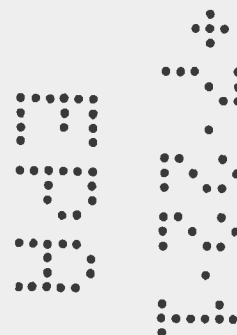
## Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in the box only apply to uses of this product that are covered by the Worker Protection Standard.

REI: Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment area. For enclosed areas including but not limited to storage rooms, coolers, shipping containers, enclosed truck trailers, ventilation shall continue until after thirty minutes (30) minutes of using fans or other mechanical ventilating system. In greenhouses, two (2) hours of ventilation using fans or other mechanical ventilating systems or four (4) hours of ventilation using vents, windows or other passive ventilation.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, prior to venting the volatile active ingredient from the treatment area is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.





## Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

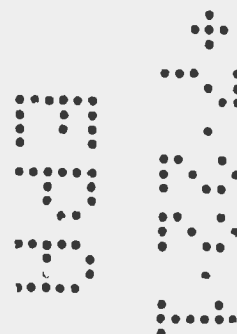
REI: Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment area. For enclosed areas including but not limited to storage rooms, coolers, shipping containers, enclosed truck trailers, ventilation shall continue until after thirty minutes (30) minutes of using fans or other mechanical ventilating system. In greenhouses, two (2) hours of ventilation using fans or other mechanical ventilating systems or four (4) hours of ventilation using vents, windows or other passive ventilation.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

## DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.





## PRODUCT INFORMATION

SmartFresh™ is a unique tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on ornamentals, including fresh cut flowers, potted flowers, bedding, nursery and foliage plants. By counteracting ethylene, SmartFresh™ provides many benefits to ornamentals during transport and storage including:

- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying senescence
- Reducing chilling injury
- Reducing premature flower death
- Reducing premature leaf and flower drop and leaf yellowing

SmartFresh™ is used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions.

Ornamentals must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

## Cut Flowers, Potted Flowers, Bedding, Nursery and Foliage Plants

SmartFresh™ treatment benefits many flowers and plants such as, but not limited to:

Achillea, Aconitum, Agapanthus, Alchemilla, Allium, Alstroemeria, Alyssum, Aphelandra, Aquilegia, Asclepias, Astrantia, Asparagus fern, Azalea, Begonia, Bouvardia, Brassia (*Schefflera*), Brodiaea (*Triteleia*), Calathea, Campanula, Carnation, Celosia, Centaurea, Chamaedorea, Chelone, Coleus, Cordyline, Cymbidium, Crocosmia (*Montbretia*), Daucus (Queen Annes Lace), Delphinium, Dendrobium, Dianthus, Dicentra, Dizygotheca, Doronicum, Echium, Eremurus, Eustoma, (*Lisianthus*), Ficus, Freesia, Fuchsia, Geranium, Gladiolus, Godetia, Gypsophila, Hibiscus, Ilex (Holly), Impatiens, Ixia, Kalanchoe, Kniphofia, Lavatera, Lily, Lysimachia, Miniature Carnation, Monkshood, Pelargonium, Petunia, Philodendron, Phlox, Physostegia, Poinsettia, Radermachera, Rose, Rudbeckia, Salvia, Saponaria, Scabiosa, Silene, Snapdragon, Solidaster, Stock, Streptocarpus, Sweet William, Trachelium, Trollius, Veronica, Wax Flower, and Zygocactus.



## Timing of application

SmartFresh™ is used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. Flowers and plants are treated whether or not they may have been previously treated with SmartFresh or another anti-ethylene product. Additional applications are beneficial for prolonged storage periods and for some species with more than one flower per stem (i.e. snapdragons, delphiniums, miniature carnations, and alstromeria) and flowers at different stages of development on the same plant (i.e. geraniums, impatiens, and azaleas).

Plants being held for shipment in enclosed areas are easily treated with SmartFresh™. For example, non-boxed sleeved potted plants and cut flowers (held dry or in solution), or boxed plants and cut flowers with the lids and/or precooling vents completely open and directly exposed to the surrounding atmosphere can be treated. Bedding or potted plants on movable racks are also easily treated.

## Application Method and Rate

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

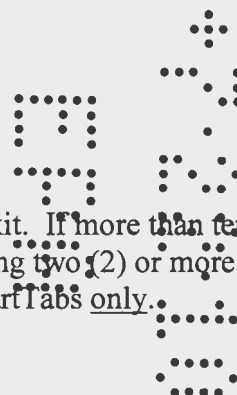
Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be 10 x 20 x 12 = 2400 cubic feet. To calculate the height measurement for greenhouses with a peaked roof, use one half of the sum of the height at the peak plus the height at the wall.

b) Choose the correct number of **Green** SmartFresh™ SmartTabs according to the size of the area as follows.

Use one GREEN tablet per 150 cubic feet of treatment area or  
For 20 foot truck container use 7 GREEN tablets  
For 40 foot truck container use 14 GREEN tablets

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.  
**Always use two (2) Blue tablets for EACH Activator Kit.**





## Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container/Greenhouse

To be used with SmartFresh™, rooms/containers/trailers/greenhouses must be gas tight and have an internal fan for mixing the atmosphere.

### Check that:

- All room/trailer/container/greenhouse drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber      No large cracks
  - No plastic slat doors      No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the ornamentals to be treated

Step 4: Release of 1-MCP

- Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.  
**Always use both Blue tablets.**
- Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- Add both the **Blue** and **Green** Tablets to the Activator Solution.
- Replace the cap.
- Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- Do not open the doors for AT LEAST four (4) hours for ornamentals treated at >55F and for at least ten (10) hours for ornamentals treated at or below 55F.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated area by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. For greenhouses, vent the treated area by opening doors and windows for a minimum of two hours with continued full internal ventilation or four hours with passive ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal.



facility. Store treated ornamentals not intended for immediate sale according to standard commercial practices.

## Restrictions

Do not split tablets. Use whole tablets only.

Do not smoke during the SmartFresh™ application.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

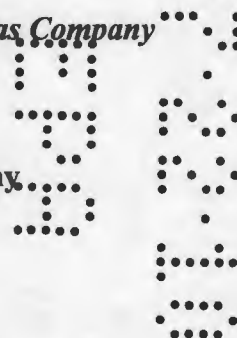
**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Triple rinse of equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### WARRANTY AND DISCLAIMER

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. To the extent permitted by applicable law, risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

*SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company*  
U.S. Patents 5,518,988, 6,017,849 and 6,762,153

AgroFresh Inc.  
A Fully-Owned Subsidiary of Rohm and Haas Company.  
100 Independence Mall West  
Philadelphia, PA. 19106  
(215) 592-3000





SUBLABEL B: Fruit and vegetables

<b>SmartFresh™ SmartTabs</b>	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
----------------------------------	---

Protects harvested fruit and vegetables from the various effects of ethylene.

**Active Ingredient:**

1-Methylcyclopropene.....0.63%

**Other Ingredients:** ..... 99.37%

**Total:** ..... 100.0%

**Keep Out Of Reach Of Children**

## CAUTION

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

FIRST AID	
<b>If inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15- 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice</li></ul>
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>HOTLINE</b> <b>1-215-592-3000</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Rohm and Haas at 215-592-3000 for emergency medical treatment information twenty four (24) hours a day, seven (7) days a week.	

**EPA REGISTRATION NO. 71297-3**

**EPA EST. NO. 707-WA-001**

71297-3 SmartFresh™ SmartTab  
Last label revision July 19, 2010  
Page 10 of 16



### Net Contents:

Tablets	Ounces	Grams	Tablets	Ounces	Grams	Tablets	Ounces	Grams
1	0.044	1.25	11	0.484	13.75	21	0.924	26.25
2	0.088	2.5	12	0.528	15	22	0.968	27.5
3	0.132	3.75	13	0.572	16.25	23	1.012	28.75
4	0.176	5	14	0.616	17.5	24	1.056	30
5	0.22	6.25	15	0.66	18.75	25	1.1	31.25
6	0.264	7.5	16	0.704	20	26	1.144	32.5
7	0.308	8.75	17	0.748	21.25	27	1.188	33.75
8	0.352	10	18	0.792	22.5	28	1.232	35
9	0.396	11.25	19	0.836	23.75	29	1.276	36.25
10	0.44	12.5	20	0.88	25	30	1.32	37.5

Lot No.

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and other handlers must follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### User Safety Recommendations

- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.



## Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

REI: Thirty (30) minutes

Do not enter enclosed areas until the enclosed area has been vented unless wearing the appropriate PPE. Ventilation shall continue until after thirty (30) minutes of ventilation using fans or other mechanical ventilating systems.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

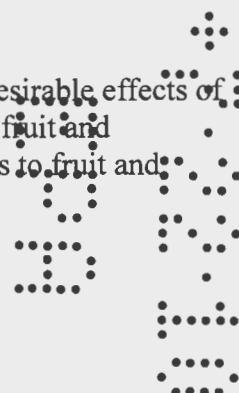
## DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

## PRODUCT INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples





- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ is used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

## Fruit And Vegetables

### Storage Conditions

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

### Timing of Application

SmartFresh™ is added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. For best results, do not use with fruit previously treated with Ethephon. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. Fruit and vegetables may benefit from repeat application, such as when the crop has been exposed to ethylene. It must be emphasized that keeping the fruit and vegetables cool at all times and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage. Only one application to the same fruit.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.



Kiwifruit: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Persimmons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Pears, Asian pears: Apply SmartFresh™ as soon after harvest as possible.

Peaches, nectarines, plums, plumcots, and apricots: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

## Application Method and Rate

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be 10 x 20 x 12 = 2400 cubic feet.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs according to the size of the area and the commodity to be treated as follows.

Apple, Asian pear, avocado, broccoli:

Use one GREEN tablet per 120 cubic feet of treatment area

Pear: Use one GREEN tablet per 200 cubic feet of treatment area.

Melon, tomato, kiwifruit, persimmon, peach, nectarine, plum, plumcot, apricot:

Use one GREEN tablet per 240 cubic feet of treatment area

Bananas: Use one GREEN tablet per 380 cubic feet of treatment area

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only. **Always use two (2) Blue tablets for EACH Activator Kit.**

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container



To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

**Check that:**

- All room/trailer/container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber      No large cracks
  - No plastic slat doors      No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables, to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.  
**Always use both Blue tablets.**
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours for avocado, banana, broccoli, kiwifruit, melon, persimmon and tomato, fifteen (15) hours for Asian pear, twenty four (24) hours for apple, nectarine, peach, pear, plum, plumcot and apricot.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twenty four (24) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated



commodities not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

## Restrictions

Do not split tablets. Use whole tablets only.

Do not smoke during the SmartFresh™ application.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

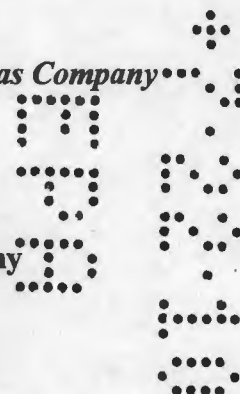
**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Triple rinse of equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### WARRANTY AND DISCLAIMER

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. To the extent permitted by applicable law, risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

*SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company*  
U.S. Patents 5,518,988, 6,017,849 and 6,762,153

AgroFresh Inc.  
A Fully-Owned Subsidiary of Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, PA. 19106  
(215) 592-3000



71297-3 SmartFresh™ SmartTab  
Last label revision July 19, 2010  
Page 16 of 16



# Receipt for Section 3

S: 879227

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Notification

Company: 71297 AGRO FRESH INC.

V

Print Letter

Enter More Information

Tracking

Risk Manager: Biologicals &amp; Pollution Prevention Division, PM Team 91

Product #: 71297-3

Product Name: SMARTFRESH SMARTTABS

Override#:

Me Too

Me Too

Section3:

Product Name:

Application Date: 19-Jul-2010



OPP Rec'd Date: 22-Jul-2010



Front End Date: 22-Jul-2010



Risk Manager Send Date: 27-Jul-2010



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐New Ingredient: ☐

Receipt Description:

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

Des

Paper Label

View/Edit

Rec'd  
7/27/10  
520





United States  
Environmental Protection Agency  
Washington, DC 20460

Registration	OPP Identifier Number
Amendment	
Other <input checked="" type="checkbox"/>	

### Application for Pesticide - Section I

Company/Product Number ProFresh, Inc. / 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification  None <input type="checkbox"/> Restricted <input checked="" type="checkbox"/>
Company/Product (Name) ProFresh™ SmartTab	PM# 91	
Name and Address of Applicant (Include Zip Code) ProFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name  <b>Notification Accepted</b> <b>Date: JUL 29 2010</b>

### Section - II

Reviewer: C. Walsh

Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
Notification - Explain below.	<input type="checkbox"/> "Me Too" Application.
	Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Update label to include lot number per PR Notice 2007-4 and notification of addition of patent numbers per PR Notice 98-10. See attachment.

### Section - III

Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container	
Certification must be submitted			
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product
Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		Other _____	

### Section - IV

Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann Beaulieu	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 215-619-5534
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
Signature 	Director, Regulatory Affairs	
Typed Name Ann Beaulieu	5. Date July 19, 2010	



Attachment for 8570-1  
71297-3  
July 19, 2010

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146 and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirement of 40 CFR 156.10, 156.140, 156.144, 156.146 and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

*Amesbury*







July 19, 2010

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Re: SmartFresh™ SmartTab  
EPA Registration Number 71297-3  
Active Ingredient = 1-methylcyclopropene  
Compliance with PR Notice 2007-4: Pesticide Management and Disposal;  
Standards for Pesticide Containers and Containment

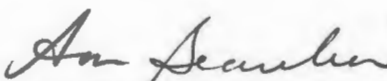
To meet compliance with PR Notice 2007-4, the lot number has been added to the May 26, 2009 approved SmartFresh SmartTab label, which included disposal instructions per PR Notice 2007-4.

Patent numbers covering this technology have also been added to this label as allowed under PR Notice 98-10.

Enclosed please find a copy of the modified label with all changes highlighted and in red font.

If you have any questions, please contact me at 215-619-5534 or [abeaulieu@agrofresh.com](mailto:abeaulieu@agrofresh.com). Thank you.

Sincerely,

  
Ann Beaulieu  
Director, Regulatory Affairs



enclosures





# United States Environmental Protection Agency

Office of Pesticide Programs (7505C)  
Washington, DC 20460

## Notice of Supplemental Distribution of a Registered Pesticide Product

### Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product  
71297-3

Distributor Company Number  
072992

**Note: Do not submit distributor product labels**

Name of Registered Product (basic product name accepted by EPA)  
SmartFresh SmartTab

Distributor Product Name  
Ethylene Buster TABLETS

Name and Address of Distributor (Type; include ZIP code)

Chrysal International bv  
3036 nw 107th avenue  
Miami, FL 33172

### Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

### Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Date

[Signature]  
CED

30.10.09

### Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Date

[Signature]  
Director, Pesticide Affairs

27. Nov 2009



# Material to be added to an e-Jacket/Jacket

Reg. No. 71297-3

1. ☒ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top/newest)
  - ☐ Description: (PDF page number, i.e., "before page 45")
- 
- 

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF
- ☒ Other: FINAL PRINTED LABEL

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Sylvester George

Phone: 713-603-0688 Division: BPPD

Date: 9/29/2009



# Receipt for Section 3

S: 858336	Resubmission: <input type="radio"/> Yes <input checked="" type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>						
Regulatory Type: Product Registration - Section 3	Fee For Service: <input type="radio"/> Yes <input checked="" type="radio"/> No							
Application Type: Miscellaneous Receipt	Billable: <input type="radio"/> Yes <input checked="" type="radio"/> No							
Company: 71297 AGRO FRESH INC.	<input checked="" type="checkbox"/> V							
Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91								
Product #: 71297-3	Product Name: SMARTFRESH SMARTTABS							
Override#:								
Me Too Section3:	Me Too Product Name:							
Application Date: 14-Aug-2009	OPP Rec'd Date: 18-Aug-2009	<table border="1"> <tr> <th>Receipt Content</th> <th>Des</th> </tr> <tr> <td>Paper Label</td> <td></td> </tr> <tr> <td colspan="2"> <div>View/Edit</div> </td> </tr> </table>	Receipt Content	Des	Paper Label		<div>View/Edit</div>	
Receipt Content	Des							
Paper Label								
<div>View/Edit</div>								
Front End Date: 21-Aug-2009	Risk Manager Send Date: 21-Aug-2009							
FFS Due Date:	Negotiated Due Date:							
OPP Target Date:								
Fast Track: <input type="checkbox"/>	New Ingredient: <input type="checkbox"/>							
Receipt Description:								
<div>Final Printed Label dated 5/26/09.</div> <div>AUG 21 2009 SG</div>		New Ingredient Request Date: New Ingredient Received Date:						
Form A: <input type="checkbox"/>	Signature Date:	Form B: <input type="checkbox"/>						

Rec'd.

AUG 25 2009

Sdh

0. Assign to Mary P. Sylvester / George

Re-AEO-Sylvester

SEP 18 2009

Sdh

Rec'd 9/18/09 SG.

Reg Jacket 9/28/09 SG

Completed 9/29/09 SG

~~AEO-Mary~~

SEP 10 2009

~~Sdh~~

Rec'd

SEP 10 2009

ACB



~~Submission~~  
S856336



August 14, 2009

Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Re: SmartFresh™ SmartTab  
EPA Registration Number 71297-3  
Active Ingredient = 1-methylcyclopropene  
Final Printed Labeling (per EPA letter dated May 26, 2009)

Enclosed please find the requested two (2) copies of the final printed labeling for SmartFresh SmartTab. This label includes the amendments approved on May 26, 2009.

If you have any questions, please contact me at 215-619-5534 or [abeaulieu@agrofresh.com](mailto:abeaulieu@agrofresh.com).  
Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Ann Beaulieu".

Ann Beaulieu  
Director, Regulatory Affairs

cc : C. Pfeifer  
enclosures





**SmartFresh™**  
**SmartTabs**

AgroFresh Inc.  
A subsidiary of Rohm and Haas Company  
Philadelphia, PA. 19106  
Tel: (215) 592-3000

Protects harvested fruit and vegetables from the various effects of ethylene.

**Active Ingredient:**

1-Methylcyclopropene..... 0.63%

**Other Ingredients:**..... 99.37%

**Total:**..... 100.0%

## Keep Out Of Reach Of Children

# CAUTION

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

### FIRST AID

<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15- 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>

### HOTLINE

**1-215-592-3000**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Rohm and Haas at 215-592-3000 for emergency medical treatment information twenty four (24) hours a day, seven (7) days a week.

**EPA REGISTRATION NO. 71297-3**

**EPA EST. NO. 707-WA-001**

**Net Contents:** 10 tablets, 0.44 ounces (12.5 g)



**PRECAUTIONARY STATEMENTS****HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

**PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Applicators and other handlers of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and other handlers must follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**User Safety Recommendations**

- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**DIRECTIONS FOR USE**

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

**Non-Agricultural Use Requirements**

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

**REI:** Do not enter enclosed areas until the enclosed area has been vented unless wearing the appropriate PPE. Ventilation shall continue until after thirty (30) minutes of ventilation using fans or other mechanical ventilating systems.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

**PRODUCT INFORMATION**

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to fruit and vegetables during transport and storage including:

- Maintaining firmness
- Preventing titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ is used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

**Fruit And Vegetables****Storage Conditions**

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

**Timing of Application**

SmartFresh™ is added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. For best results, do not use with fruit previously treated with Ethephon. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. Fruit and vegetables may benefit from repeat application, such as when the crop has been exposed to ethylene. It must be emphasized that keeping the fruit and vegetables cool at all times and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

**Apples:** Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

**Avocados:** Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage. Only one application to the same fruit.

**Bananas:** Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

**Broccoli:** Apply SmartFresh™ as soon after harvest as possible.

**Kiwifruit:** Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

**Melons:** Apply SmartFresh™ as soon after harvest as possible.

**Persimmons:** Apply SmartFresh™ as soon after harvest as possible.

**Tomatoes:** Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

**Pears, Asian pears:** Apply SmartFresh™ as soon after harvest as possible.

**Peaches, nectarines, plums, plumcots, and apricots:** Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

**Application Method and Rate**

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are Green tablets that, when mixed with Blue Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be 10 x 20 x 12 = 2400 cubic feet.

b.) Choose the correct number of Green SmartFresh™ SmartTabs according to the size of the area and the commodity to be treated as follows.

**Apple, Asian pear, avocado, broccoli:**

Use one GREEN tablet per 120 cubic feet of treatment area

**Pear:** Use one GREEN tablet per 200 cubic feet of treatment area.

**Melon, tomato, kiwifruit, persimmon, peach, nectarine, plum, plumcot, apricot:**

Use one GREEN tablet per 240 cubic feet of treatment area

**Bananas:** Use one GREEN tablet per 380 cubic feet of treatment area

Never use more than ten (10) Green SmartFresh™ SmartTabs per activator kit. If more than ten (10) Green SmartFresh™ SmartTabs are needed, you must divide



3

4

5





them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only. **Always use two (2) Blue tablets for EACH Activator Kit.** Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

**Check that:**

- All room/trailer/container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber No large cracks
  - No plastic slat doors No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables, to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block. **Always use both Blue tablets.**
- b) Remove the appropriate number of Green SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the Blue and Green Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours for avocado, banana, broccoli, kiwifruit, melon, persimmon and tomato, fifteen (15) hours for Asian pear, twenty four (24) hours for apple, nectarine, peach, pear, plum, plumcot and apricot.

- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twenty four (24) hours.

**Step 5: Reentry To The Storage Area**

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated commodities not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

**Restrictions**

Do not split tablets. Use whole tablets only.  
Do not smoke during the SmartFresh™ application.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**WARRANTY AND DISCLAIMER**

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. To the extent permitted by applicable law, risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, AGROFRESH INC. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company

AgroFresh Inc.  
A Fully-Owned Subsidiary of Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, PA. 19106  
(215) 592-3000

**SmartFresh™  
SmartTabs**

AgroFresh Inc.  
A subsidiary of Rohm and Haas Company  
Philadelphia, PA. 19106  
Tel: (215) 592-3000

Protects harvested fruit and vegetables from the various effects of ethylene.

**Active Ingredient:**  
1-Methylcyclopropene..... 0.63%  
**Other Ingredients:**..... 99.37%  
**Total:**..... 100.0%

**Keep Out Of Reach Of Children  
CAUTION**

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

**FIRST AID**

If inhaled	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>

**HOTLINE  
1-215-592-3000**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Rohm and Haas at 215-592-3000 for emergency medical treatment information twenty four (24) hours a day, seven (7) days a week.

EPA REGISTRATION NO. 71297-3  
EPA EST. NO. 707-WA-001

**Net Contents:** 10 tablets, 0.44 ounces (12.5 g)

**Complies with  
EPA Accepted Labeling**

Date: 05/26/2009

Reviewer: Sylvester George

file: 9375-3\_book\_art  
folder: 9375-3\_RohmHaas\_71297  
color: black

created: 6-29-06 bm  
alt: 06-16-09 jw  
size: 3"(w) x 5.875"(h)



10252

# Material to be added to an e-Jacket

Reg. No. 71297-3

1. Placement within the e-Jacket:

- ☒ Default: chronological top
- ☐ Other: (PDF page number, i.e., "before page 45")  
\_\_\_\_\_

2. Is this material:

- ☐ Newly stamped accepted label
- ☒ Notification
- ☐ New CSF
- ☐ Other: \_\_\_\_\_

3. Attach this notice on top of the material. It must be clipped all together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Diana Hudson

Phone: 308-8713 Division: BPPD

Date: 6-5-09





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

June 5, 2009

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Ann Beaulieu, Ph.D., Director  
Regulatory Affairs  
AgroFresh, Inc.  
727 Norristown Rd.  
P.O. Box 904  
Spring House, PA 19477-0904

RE: Product Name: SmartFresh SmartTabs  
EPA Reg. No: 71297-3  
Application for Label Notification Dated April 22, 2009 for Alternate Brand  
Name: EthylBloc Tab

Dear Dr. Beaulieu:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration (PR) Notice 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PR Notice 98-10 and it has been determined that the action(s) requested falls within the scope of PR Notice 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification, received and reviewed" and will be placed accordingly in our records.

For any question you may have concerning this action, please contact Ms. Diana Hudson at (703) 308-8713 or email at [hudson.diana@epa.gov](mailto:hudson.diana@epa.gov).

Sincerely,

*Linda Hollis*

Linda Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention  
Division (7511P)



S: 849134	Resubmission: <input type="radio"/> Yes <input checked="" type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>						
Regulatory Type: Product Registration - Section 3	Fee For Service: <input type="radio"/> Yes <input checked="" type="radio"/> No							
Application Type: Notification								
Company: 71297 AGRO FRESH INC.	V							
Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91								
Product #: 71297-3	Product Name: SMARTFRESH SMARTABS							
Override#								
Me Too	Me Too							
Section3:	Product Name:							
Application Date: 22-Apr-2009	OPP Rec'd Date: 24-Apr-2009	<table border="1"> <tr> <th>Receipt Content</th> <th>Des</th> </tr> <tr> <td>Other</td> <td>Notification of alterna</td> </tr> <tr> <td colspan="2"> <div>View/Edit</div> </td> </tr> </table>	Receipt Content	Des	Other	Notification of alterna	<div>View/Edit</div>	
Receipt Content	Des							
Other	Notification of alterna							
<div>View/Edit</div>								
Front End Date: 24-Apr-2009	Risk Manager Send Date: 27-Apr-2009							
FFS Due Date:	Negotiated Due Date:							
OPP Target Date:								
Fast Track: <input type="checkbox"/>	New Ingredient: <input type="checkbox"/>							
Receipt Description:								
Notification of Alternate Brand Name:								
Form A: <input type="checkbox"/>	Signature Date:							
Form B: <input type="checkbox"/>	Signature Date:							

2 Notification. Diana

Alternate Brand name "OK"

AIO-Hudson  
MAY 1 2009  
sdh

Recd.  
APR 27 2009  
ABB



April 22, 2009

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
US Environmental Protection Agency  
Biopesticides and Pollution Prevention Division  
One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Subject: Notification of Alternate Brand Name per Notice 98-10  
EPA Registration Number 71297-3  
Product: SmartFresh™ SmartTab  
Active Ingredient = 1-methylcyclopropene

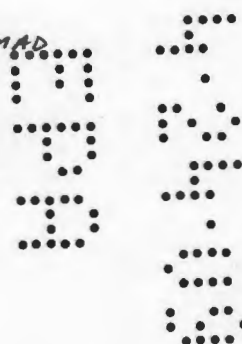
This is a notification to add an alternate brand name for SmartFresh™ SmartTab. The alternate brand name is EthylBloc™ Tab. The primary brand name remains SmartFresh™ SmartTab.

This change is being made by notification and is consistent with the notifications allowed under PR Notice 98-10.

Sincerely,



Ann Beaulieu, Ph.D.  
Director, Regulatory Affairs



Attachment form 8570-1

**AgroFresh**<sup>Inc.</sup>

727 Norristown Road, P.O. Box 904, Spring House, PA 19477-0904  
www.smartfresh.com • (TEL) 215-641-7000 • (FAX) 215-619-1646





United States  
**Environmental Protection Agency**  
 Washington, DC 20460

☒ **Registration**

OPP Identifier Number

☐ **Amendment**
☒ **Other**
**Application for Pesticide - Section I**

Company/Product Number AgroFresh Inc / 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification  None X Restricted
Company/Product (Name) AgroFresh Inc / SmartFresh SmartTab	PM#	
Name and Address of Applicant (Include Zip Code) AgroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399  <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: <b>NOTIFICATION</b> EPA Reg. No. Product Name Date Reviewed: <u>6-5-09</u> Reviewed By: <u>D. Hudson</u>	

**Section - II**

Amendment - Explain below.



Final printed labels in response to Agency letter dated \_\_\_\_\_



"Me Too" Application.

Notification - Explain below.

Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

This notification is to add the alternate brand name, EthylBloc Tab to SmartFresh SmartTab, which remains the primary brand.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the CSF of this product. I understand that it is a violation of 18 USC Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 142.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III****Material This Product Will Be Packaged In:**

Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt. container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack
<b>Certification must be submitted</b>			
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	

Manner in Which Label is Affixed to Product



Other

**Section - IV****Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name John Hecht Beaulieu	Title Regulatory Director, AgroFresh, Inc.	Telephone No. (Include Area Code) 215-619-5534
-----------------------------	---	---

**Certification**

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I understand that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received

(Stamped)

Signature <u>John Hecht Beaulieu</u>	Director, Regulatory Affairs
Typed Name John Hecht Beaulieu	5. Date April 22, 2009



Ms. Ann Beaulieu  
AgroFresh, Inc. / Rohm and Haas Company  
Philadelphia, PA 19106-2399

**MAY 26 2009**

**Subject:** AgroFresh, Inc., SmartFresh SmartTab  
EPA Registration No. 71297-3  
Amendment to Add Ornamentals and to Create a Master Label  
Application Dated 3/4/09

Dear Ms. MacLean:

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(A), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Submit two (2) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(b). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions contact Chris Pfeifer at 703-308-0031 or by email at: [pfeifer.chris@epa.gov](mailto:pfeifer.chris@epa.gov). A stamped copy of the label is enclosed for your records.

Sincerely,



Linda A. Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution  
Prevention Division (7511P)

Enclosure

**CONCURRENCES**

OL	7511P							
AME	PFEIFER							
	5/21/9							



## MASTER LABEL

### SmartFresh™ SmartTabs

Sublabel A: Commercial Ornamentals (Fresh cut flowers, potted flowers, bedding, nursery and foliage plants)

Sublabel B: Fruit and Vegetables (Non-Agricultural Use)

#### ACTIVE INGREDIENT:

1-Methylcyclopropene: .....0.63%

OTHER INGREDIENTS:.....99.37%

Total: .....100.0%

**KEEP OUT OF REACH OF CHILDREN**

#### CAUTION

Manufactured by:

AgroFresh, Inc.

A Subsidiary of Rohm and Haas Company

100 Independence Mall

Philadelphia, PA 19106

1-215-592-3000

**ACCEPTED**

**MAY 26 2009**

Under the Federal Insecticide, Fungicide,  
and Rodenticide Act, as amended, for  
the pesticide registered under  
EPA Reg. No.

71297-3

EPA Reg. No. 71297-3

EPA Est. No. 707-WA-001



ACCEPTED

MAY 2 8 2008

Under the Federal Insecticide, Fungicide,  
and Rodenticide Act, as amended, for  
the pesticide registered under  
EPA Reg. No.

71387-5



SUBLABEL A: Commercial Ornamentals (Fresh cut flowers, potted flowers, bedding, nursery and foliage plants)

<b>SmartFresh™ SmartTabs</b>	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
----------------------------------	---

Protects ornamentals from the various effects of ethylene.

**Active Ingredient:**

1-Methylcyclopropene.....0.63%

**Other Ingredients:** ..... 99.37%

**Total:** ..... 100.0%

**Keep Out Of Reach Of Children**

## CAUTION

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

FIRST AID	
<b>If inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15- 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice</li></ul>
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>HOTLINE</b> <b>1-215-592-3000</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Rohm and Haas at 215-592-3000 for emergency medical treatment information twenty four (24) hours a day, seven (7) days a week.	

**EPA REGISTRATION NO. 71297-3**

**EPA EST. NO. 707-WA-001**

71297-3 SmartFresh™ SmartTab  
Last label revision May 21, 2009  
Page 2 of 16



### Net Contents:

Tablets	Ounces	Grams		Tablets	Ounces	Grams		Tablets	Ounces	Grams
1	0.044	1.25		11	0.484	13.75		21	0.924	26.25
2	0.088	2.5		12	0.528	15		22	0.968	27.5
3	0.132	3.75		13	0.572	16.25		23	1.012	28.75
4	0.176	5		14	0.616	17.5		24	1.056	30
5	0.22	6.25		15	0.66	18.75		25	1.1	31.25
6	0.264	7.5		16	0.704	20		26	1.144	32.5
7	0.308	8.75		17	0.748	21.25		27	1.188	33.75
8	0.352	10		18	0.792	22.5		28	1.232	35
9	0.396	11.25		19	0.836	23.75		29	1.276	36.25
10	0.44	12.5		20	0.88	25		30	1.32	37.5

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and other handlers must follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

#### User Safety Recommendations

- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.



## DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

### Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in the box only apply to uses of this product that are covered by the Worker Protection Standard.

**REI:** Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment area. For enclosed areas including but not limited to storage rooms, coolers, shipping containers, enclosed truck trailers, ventilation shall continue until after thirty minutes (30) minutes of using fans or other mechanical ventilating system. In greenhouses, two (2) hours of ventilation using fans or other mechanical ventilating systems or four (4) hours of ventilation using vents, windows or other passive ventilation.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, prior to venting the volatile active ingredient from the treatment area is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.



### Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

**REI:** Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment area. For enclosed areas including but not limited to storage rooms, coolers, shipping containers, enclosed truck trailers, ventilation shall continue until after thirty minutes (30) minutes of using fans or other mechanical ventilating system. In greenhouses, two (2) hours of ventilation using fans or other mechanical ventilating systems or four (4) hours of ventilation using vents, windows or other passive ventilation.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.



## PRODUCT INFORMATION

SmartFresh™ is a unique tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on ornamentals, including fresh cut flowers, potted flowers, bedding, nursery and foliage plants. By counteracting ethylene, SmartFresh™ provides many benefits to ornamentals during transport and storage including:

- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying senescence
- Reducing chilling injury
- Reducing premature flower death
- Reducing premature leaf and flower drop and leaf yellowing

SmartFresh™ is used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions.

Ornamentals must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

## Cut Flowers, Potted Flowers, Bedding, Nursery and Foliage Plants

SmartFresh™ treatment benefits many flowers and plants such as, but not limited to:

Achillea, Aconitum, Agapanthus, Alchemilla, Allium, Alstroemeria, Alyssum, Aphelandra, Aquilegia, Asclepias, Astrantia, Asparagus fern, Azalea, Begonia, Bouvardia, Brassia (Schefflera), Brodiaea (Triteleia), Calathea, Campanula, Carnation, Celosia, Centaurea, Chamaedorea, Chelone, Coleus, Cordyline, Cymbidium, Crocosmia (Montbretia), Daucus (Queen Annes Lace), Delphinium, Dendrobium, Dianthus, Dicentra, Dizygotheca, Doronicum, Echium, Eremurus, Eustoma, (Lisianthus), Ficus, Freesia, Fuchsia, Geranium, Gladiolus, Godetia, Gypsophila, Hibiscus, Ilex (Holly), Impatiens, Ixia, Kalanchoe, Kniphofia, Lavatera, Lily, Lysimachia, Miniature Carnation, Monkshood, Pelargonium, Petunia, Philodendron, Phlox, Physostegia, Poinsettia, Radermachera, Rose, Rudbeckia, Salvia, Saponaria, Scabiosa, Silene, Snapdragon, Solidaster, Stock, Streptocarpus, Sweet William, Trachelium, Trollius, Veronica, Wax Flower, and Zygocactus.



## Timing of application

SmartFresh™ is used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. Flowers and plants are treated whether or not they may have been previously treated with SmartFresh or another anti-ethylene product. Additional applications are beneficial for prolonged storage periods and for some species with more than one flower per stem (i.e. snapdragons, delphiniums, miniature carnations, and alstromeria) and flowers at different stages of development on the same plant (i.e. geraniums, impatiens, and azaleas).

Plants being held for shipment in enclosed areas are easily treated with SmartFresh™. For example, non-boxed sleeved potted plants and cut flowers (held dry or in solution), or boxed plants and cut flowers with the lids and/or precooling vents completely open and directly exposed to the surrounding atmosphere can be treated. Bedding or potted plants on movable racks are also easily treated.

## Application Method and Rate

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be  $10 \times 20 \times 12 = 2400$  cubic feet. To calculate the height measurement for greenhouses with a peaked roof, use one half of the sum of the height at the peak plus the height at the wall.

b) Choose the correct number of **Green** SmartFresh™ SmartTabs according to the size of the area as follows.

Use one GREEN tablet per 150 cubic feet of treatment area or  
For 20 foot truck container use 7 GREEN tablets  
For 40 foot truck container use 14 GREEN tablets

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

**Always use two (2) Blue tablets for EACH Activator Kit.**



## Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container/Greenhouse

To be used with SmartFresh™, rooms/containers/trailers/greenhouses must be gas tight and have an internal fan for mixing the atmosphere.

### Check that:

- All room/trailer/container/greenhouse drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber      No large cracks
  - No plastic slat doors      No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the ornamentals to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.  
**Always use both Blue tablets.**
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST four (4) hours for ornamentals treated at >55F and for at least ten (10) hours for ornamentals treated at or below 55F.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated area by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. For greenhouses, vent the treated area by opening doors and windows for a minimum of two hours with continued full internal ventilation or four hours with passive ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal



facility. Store treated ornamentals not intended for immediate sale according to standard commercial practices.

## Restrictions

Do not split tablets. Use whole tablets only.

Do not smoke during the SmartFresh™ application.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### WARRANTY AND DISCLAIMER

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. To the extent permitted by applicable law, risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

*SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company*

AgroFresh Inc.  
A Fully-Owned Subsidiary of Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, PA. 19106  
(215) 592-3000

71297-3 SmartFresh™ SmartTab  
Last label revision May 21, 2009  
Page 9 of 16



SUBLABEL B: Fruit and vegetables

<b>SmartFresh™ SmartTabs</b>	<b>AgroFresh Inc.</b> A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
----------------------------------	--

Protects harvested fruit and vegetables from the various effects of ethylene.

**Active Ingredient:**

1-Methylcyclopropene.....0.63%

**Other Ingredients:** ..... 99.37%

**Total:** ..... 100.0%

**Keep Out Of Reach Of Children**

**CAUTION**

Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

<b>FIRST AID</b>	
<b>If inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15- 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice</li></ul>
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>HOTLINE</b> <b>1-215-592-3000</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Rohm and Haas at 215-592-3000 for emergency medical treatment information twenty four (24) hours a day, seven (7) days a week.	

**EPA REGISTRATION NO. 71297-3**

**EPA EST. NO. 707-WA-001**

71297-3 SmartFresh™ SmartTab  
Last label revision May 21, 2009  
Page 10 of 16







### Net Contents:

Tablets	Ounces	Grams	Tablets	Ounces	Grams	Tablets	Ounces	Grams
1	0.044	1.25	11	0.484	13.75	21	0.924	26.25
2	0.088	2.5	12	0.528	15	22	0.968	27.5
3	0.132	3.75	13	0.572	16.25	23	1.012	28.75
4	0.176	5	14	0.616	17.5	24	1.056	30
5	0.22	6.25	15	0.66	18.75	25	1.1	31.25
6	0.264	7.5	16	0.704	20	26	1.144	32.5
7	0.308	8.75	17	0.748	21.25	27	1.188	33.75
8	0.352	10	18	0.792	22.5	28	1.232	35
9	0.396	11.25	19	0.836	23.75	29	1.276	36.25
10	0.44	12.5	20	0.88	25	30	1.32	37.5

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION:** Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

Applicators and other handlers must follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

#### User Safety Recommendations

- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.



## DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

### Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

**REI:** Do not enter enclosed areas until the enclosed area has been vented unless wearing the appropriate PPE. Ventilation shall continue until after thirty (30) minutes of ventilation using fans or other mechanical ventilating systems.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

### PRODUCT INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury



SmartFresh™ is used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

## **Fruit And Vegetables**

### **Storage Conditions**

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

### **Timing of Application**

SmartFresh™ is added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. For best results, do not use with fruit previously treated with Ethephon. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. Fruit and vegetables may benefit from repeat application, such as when the crop has been exposed to ethylene. It must be emphasized that keeping the fruit and vegetables cool at all times and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage. Only one application to the same fruit.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Kiwifruit: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Persimmons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Pears, Asian pears: Apply SmartFresh™ as soon after harvest as possible.

Peaches, nectarines, plums, plumcots, and apricots: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.



## Application Method and Rate

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be 10 x 20 x 12 = 2400 cubic feet.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs according to the size of the area and the commodity to be treated as follows.

Apple, Asian pear, avocado, broccoli:

Use one GREEN tablet per 120 cubic feet of treatment area

Pear: Use one GREEN tablet per 200 cubic feet of treatment area.

Melon, tomato, kiwifruit, persimmon, peach, nectarine, plum, plumcot, apricot:

Use one GREEN tablet per 240 cubic feet of treatment area

Bananas: Use one GREEN tablet per 380 cubic feet of treatment area

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

**Always use two (2) Blue tablets for EACH Activator Kit.**

Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

### Check that:

- All room/trailer/container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber      No large cracks
  - No plastic slat doors      No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off



Step 3: Fill the treatment room with the fruit or vegetables, to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.  
**Always use both Blue tablets.**
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours for avocado, banana, broccoli, kiwifruit, melon, persimmon and tomato, fifteen (15) hours for Asian pear, twenty four (24) hours for apple, nectarine, peach, pear, plum, plumcot and apricot.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twenty four (24) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated commodities not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

## Restrictions

Do not split tablets. Use whole tablets only.

Do not smoke during the SmartFresh™ application.



#### **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### **WARRANTY AND DISCLAIMER**

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. To the extent permitted by applicable law, risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

*SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company*

**AgroFresh Inc.  
A Fully-Owned Subsidiary of Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, PA. 19106  
(215) 592-3000**



# BPPD Label Amendment Checklist

Fast Track ☒

PA Reg. No.: 71297-3

RAL: Chris Pfeifer

Application Date: 3/4/09

Check list Item	Yes	No
<b>Application Form</b> (EPA Form 8570-1) - signed & complete, including package type? <b>If NO, stop!</b> Call applicant and have them correct application and resubmit.	✓	
<b>Final printed labeling</b> received for previous action? <b>If NO, stop!</b> E-mail applicant and request final printed labeling (FPL).	✓	
<b>Data and Data Matrix</b> present? (EPA Form 8570-35) A Data Matrix is not required for 100% repacks that have the same label uses as the parent product, and that derive their data from the formulator; nor is it required for minor amendments, which do not rely on data. In these cases, skip to Item 5.		✓ NA Skip to 5
Using Selective Method (including the cite-all option under the Selective Method)? <b>If using Cite-all method only, skip to Item 4.</b>		
Complete Data Matrix supporting both the product registration and the proposed amendment. Minimum Data Matrix for registration includes: Product specific Acute Toxicity and Product Chemistry data, plus Efficacy data for public health pests claimed on label.		
Adequate product specific data?		
Registered source used for active ingredient? <b>If YES, skip to Item 5. If NO or if use not supported by registered source, generic data is necessary.</b>		
Data passed PR Notice 86-5 for formatting and MRID assignment?		
Public copy of Data Matrix provided? (PRN 98-5)		
<b>Certification with Respect to Citation of Data</b> present. (EPA Form 8570-34): See 40 CFR 152.80-98 and PR Notice 98-5. (If no data are required, a Certification with Respect to Citation of Data form isn't needed. This is often true for minor amendments.) <b>NA <input checked="" type="checkbox"/></b>		
Did applicant check a Method of Support?		
General Offer to Pay checked for Cite-all Method or Cite-all under Selective Method?		
Is the form signed and dated?		
Check form and Data Matrix. Are Exclusive Use data cited from other sources?		
If YES, is the required authorization letter included in application? <b>NA <input type="checkbox"/></b>		
<b>Label(s) Review</b> <span style="float: right;"><b>Date of Label Review: 5/14/09</b></span>		
Label(s) in conformance with current <i>Label Review Manual</i> and appropriate REDS.	✓	
Labeling from Acute Toxicity, Product Chemistry, and Efficacy data for public health pests claimed on label.	✓	
Nominal concentration of active ingredient shown in ingredients statement.	✓	
Viability included as sub-statement of Ingredient Statement (if live microbial, i.e., cfu/gram). <b>NA <input checked="" type="checkbox"/></b>		
Storage and disposal instructions agree with container types listed on application form.	✓	
Unique Product Name for Same Company (Check OPPIN).	✓	
Does CSF list peanuts, tree nuts, milk, soybeans, eggs (including putrescent eggs), fish, crustacea, or wheat commodities? <b>If YES, RAL must evaluate label for compliance with 40 CFR 180.1071.</b>		✓
Does label bear "National Organic Program" (PR Notice 2003-1) or OMRI claims?		✓
If YES, National Organic Program or OMRI claims approved by Chris Pfeifer? <b>NA <input checked="" type="checkbox"/></b>		✓
Labeling is acceptable. Corrections or changes are NOT necessary.	✓	
Comments: A non-food use was added to this food use product. Both food and non-food uses are common with this ai. The application rates for the new non-food use match those of the product from which the tox categories were bridged (71927-1).		



# Label Review

File Symbol: 71297-3

Date: 5/14/9

Reviewer: Chris Pfeifer

Site/Use	[Res / Ag / Both]		[Food / Non-Food / Both]		
Tox Categories: (B)ridged	[AcOral: 4B /AcDerm: 3B /AcInhl: 4B /EyeIrr: 3B /SkinIrr: 4B DermSens: No B ]				
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
Restricted Use Pesticide	-----	-----	-----		Ch 6
Product Name	√				Pg 12-3
Compny Name and Info	√				Pg 15-1
Identification Numbers	√				Ch 14
Net Contents	√				Ch 17
Ingredients Statement	√				Ch 5
Label Claims	√				Pgs 4-5, 5-7 11-10 & Ch 12
Alternate Formula			√		5-12

## Precautionary Statements

Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
KOROC	√				3-1 & 9 7-3 & 4
Signal Word	√				Ch 3 Ch 7 Ch 10
General Heading Precautionary Statements	√				Ch 7
First Aid (PRN 20001-1)	√			Edited	Ch 3 & 7

Hazards to Humans and Domestic Animals	√				Ch 3, 7-3
PPE (WPS) Engineering Controls			√	Edited	Ch 7, Pg 7-12 Pgs 10-4, 15
User Safety Requirements			√	Edited	Ch 10
User Safety Recommendations			√	Edited	Ch 10
Environmental Hazards	√				Ch 8
Physical and Chemical Hazards			√		Pg 3-4 Ch 9




Directions for USE (FIFRA Text, WPS plus Storage and Disposal)					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
Header: Directions for Use	√				10-16
Violation of Federal Law text	√				10-26, 11-7
WPS Text (PPE)	√			Edited	Ch 10, 7-1 7-11
Non-WPS Text	√			Edited	7-12, Ch 10
Storage and Disposal	√				11-16, Ch 13

Directions for Use (General Instructions and Information)					
Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
General Instructions and Sub-Header	√				
Chemigation / Prohibition			√		PRN
REI	√			Edited	Pg 10-20

Label Requirement	Acceptable	Not Acceptable	N/A	Comments Recommendations	LRM3
General Info. (non-site specific info. on uses, pests, mixing, and loading, tank mixing, etc.)	√			Edited	
General Precautions and Restrictions	√				
Directions for Use					
Directions for Application	√			Edited	
Warranty Information					
Consistency with label instructions	√				12-6
Not false or misleading	√			Edited	
<p>"The warranty section contains an overly broad statement concerning limitations of liability. As such, this statement may be misleading and may constitute misbranding under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). It is suggested that the existing statement be preceded by the phrase, "to the extent allowable by state law," or otherwise qualified to make it clear that this warranty is not intended to be a statement of law which implies that the buyer has no legal rights to recover damages from the manufacturer if he/she suffered a loss or injury from the product and concludes that it would be futile to pursue what might in reality be a valid claim."</p>					





**71297-3 Immediate Attention**   
Chris Pfeifer to: Ann Hecht Dr Beaulieu

---

05/21/2009 04:04 PM

Hi Ann,

You mistakenly placed the Ag and Non-Ag Use Requirements in the Precautionary Statements Section, not in the Directions for Use. I'm correcting it, so that I can submit, on the assumption that it is OK with you. Please send me your corrected version ASAP.

Regards,  
Chris  
EPA BPPD  
703-308-0031





**71297-3 and ethephon**

**Ann Hecht Dr Beaulieu to: Chris Pfeifer**

**05/21/2009 03:37 PM**

---

**History:** This message has been replied to.

---

Chris,

As requested: Since the original label was written, we have found that fruit pretreated with ethephon may be treated with 1MCP and therefore have removed the restriction. You will find a statement in the label text stating that fruit pretreated with ethephon may be treated with Smartfresh.

Regards,

Ann

Sent from my BlackBerry





71297-3 revised label  
Ann Hecht Dr Beaulieu to: Chris Pfeifer

05/20/2009 11:47 AM

Chris,

Thanks for your detailed comments yesterday as well as the example master label. Attached is the revised label that incorporates the specific comments we discussed yesterday as well as replacing the word "may" where possible. I want to highlight two points:

On the Agricultural Use Sublabel:

On page 4, I added two REI's. The 30 minute interval had been approved for closed areas but since we did not have specific data on greenhouse, I kept the previously agreed to interval for ornamentals in a greenhouse. Please let me know if this is acceptable.

On page 5, I added additional information regarding the application method and rate. To make it easier for the user, I added in the number of green tablets for the commonly used closed containers. This yields the same rate as shown in Step 1.b. This statement had been inadvertently omitted on the previously submitted version.

For your convenience, I enclose two versions one with the new edits highlighted in red and one copy all in black. Please let me know if you need anything else. I really appreciate your efforts to finalize this submission as soon as possible. thank you.

**AgroFresh**

Ann Beaulieu | Director | Regulatory Affairs |  
phone: + 1-215-619-5534 | cell: +1-215-205-9303 |  
intl: +1-267-357-9239 | fax: + 1-215-619-1672 | [www.agrofresh.com](http://www.agrofresh.com)



February 9, 2009

Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: Linda Hollis, Chief, Biochemical Pesticides Branch, BPPD

Re: SmartFresh™ SmartTab  
EPA Registration Number 71297-3  
Active Ingredient = 1-methylcyclopropene  
Amendment to revise use instructions and add crops

This is a request to amend the label of SmartFresh™ SmartTabs. The following changes are included in this amended label.

1. The "Application Method" section has been modified to make determining the number of tablets easier and more accurate for the treated enclosed area. There is no change in the rate; the rate in the revised label, for each approved crop, is the same as the rate, for each approved crop, in the currently approved label. Table 1, "Number of Green SmartTabs Required" has been replaced with a simple guide, Step 1(b) in the Application Method and Rate section.
2. Additional pome fruit as well as stone fruits have been added to this label. No data is needed to support these changes because:
  - (a) Pome fruit and stone fruit are already approved for use on the SmartFresh™ label (EPA Registration Number 71297-2), a powder formulation of the same active ingredient, 1-methylcyclopropene.
  - (b) The use rate for each crop is the same as specified on the currently approved SmartFresh™ label.
  - (c) The use pattern (indoor, postharvest) and method of application for all crops are the same as for SmartFresh™.
  - (d) The use instructions have been modified to allow repeat use of 1-MCP. There are no detectable residues following the use of 1-MCP as shown in the previously submitted residue study (MRID 45609002). Per 40CFR 180.1220, 1-MCP is exempt from the requirements of a tolerance for all fruit and vegetables.

**AgroFresh** Inc.



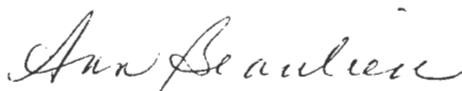
3. The crop, ornamentals, has been added to this label. No data is needed to support this change because:
- (a) The ornamental species are already approved for use on the label of EthylBloc™ (EPA Registration Number 71297-1), a powder formulation of the same active ingredient, 1-methylcyclopropene.
  - (b) The use rate for ornamentals and number of applications are the same as prescribed on the EthylBloc™ label.
  - (c) The indoor use pattern and method of application for ornamentals are the same as for EthylBloc™.
4. The storage disposal instructions have been revised as per PR Notice 2007-4.

Enclosed please find:

- Completed EPA Form 8570-1
- Amended SmartFresh™ SmartTab label (71297-3) with changes in red
- Amended SmartFresh™ SmartTab label (71297-3)
- Accepted SmartFresh™ Technology label (71297-2)
- Accepted EthylBloc™ label (71297-1)

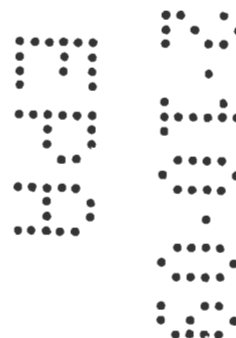
If you have any questions, please contact me at 215-619-5534 or [abeaulieu@agrofresh.com](mailto:abeaulieu@agrofresh.com).  
Thank you.

Sincerely,



Ann Beaulieu  
Director, Regulatory Affairs

enclosures







United States  
**Environmental Protection Agency**  
 Washington, DC 20460

X	<b>Registration</b>	OPP Identifier Number
	<b>Amendment</b>	
	<b>Other</b>	

### Application for Pesticide - Section I

Company/Product Number agroFresh, Inc. / 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification  None X Restricted
Company/Product (Name) SmartFresh™ SmartTab	PM#	
Name and Address of Applicant (Include Zip Code) agroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No.  Product Name	

### Section - II

Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
Notification - Explain below.	<input type="checkbox"/> "Me Too" Application.
	Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

Modify use instructions and waste disposal; add pomme and stone fruit (accepted on 71297-2, same active ingredient) and ornamentals (accepted on 71297-1, same active ingredient).

### Section - III

<b>Material This Product Will Be Packaged In:</b>					
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack
	If "Yes"	No. per	If "Yes"	No. per	
	Unit Packaging wgt.	container	Package wgt.	container	
			z		
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		Other _____			

### Section - IV

<b>Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</b>		
Name Ann Beaulieu	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 215-619-5534
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received  February 9, 2009
Signature 		
Typed Name Ann Beaulieu		
Director, Regulatory Affairs		5. Date February 9, 2009



# Receipt for Section 3

S:	844413	Regulation:	<input type="radio"/> Yes <input checked="" type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>						
Regulatory Type:	Product Registration - Section 3	Fee For Service:	<input checked="" type="radio"/> Yes <input type="radio"/> No							
Application Type:	Amendment	Billable:	<input checked="" type="radio"/> Yes <input type="radio"/> No							
Company:	71297 AGRO FRESH INC.		V							
Risk Manager:	Biologicals & Pollution Prevention Division, PM Team 91									
Product #:	71297-3	Product Name:	SMARTFRESH SMARTTABS							
Override#:										
Me Too Section3:		Me Too Product Name:								
Application Date:	09-Feb-2009	OPP Rec'd Date:	10-Feb-2009	<table border="1"> <thead> <tr> <th>Receipt Content</th> <th>Des</th> </tr> </thead> <tbody> <tr> <td>Paper Label</td> <td></td> </tr> <tr> <td colspan="2"> <div>&lt;   &gt;</div> </td> </tr> </tbody> </table>	Receipt Content	Des	Paper Label		<div>&lt;   &gt;</div>	
Receipt Content	Des									
Paper Label										
<div>&lt;   &gt;</div>										
Front End Date:	10-Feb-2009	Risk Manager Send Date:								
FFS Due Date:		Negotiated Due Date:								
OPP Target Date:										
Fast Track:	<input type="checkbox"/>	New Ingredient:	<input type="checkbox"/>	View/Edit						
Receipt Description:	Modify use instructions and waste disposal <div></div>		New Ingredient Request Date: <div></div> New Ingredient Received Date: <div></div> Form A: <input type="checkbox"/> Signature Date: <div></div>	Form B: <input type="checkbox"/> Signature Date: <div></div>						

300 Fast track Andy

LH  
2/12/09

AIO-Andy  
MAR 4 2009  
sdh





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

February 12, 2009

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

ROBERT H. LARKIN  
AGRO FRESH INC.  
C/O ROHM AND HAAS COMPANY  
100 INDEPENDENCE MALL WEST  
PHILADELPHIA, PA 19105

PRODUCT NAME: SMARTFRESH SMARTTABS  
COMPANY NAME: AGRO FRESH INC.  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 71297-3  
EPA RECEIPT DATE: 02/10/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Biologicals & Pollution Prevention Division, PM Team 91, at (703) 308-8733.

Sincerely,

*P. E. Thorne*

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division



# Fee for Service

{844413Å~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?  
☐ volpay % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☒ BPPD
- ☐ RD

Risk Mgr.

91

Receipt No.

S-

844413

EPA File Symbol/Reg. No.

71297-3

Pin-Punch Date:

2/10/2009

☒ This item is NOT subject to FFS action.

## Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_\_

## Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: L. Holtz

Date: 2/12/09

Remarks:



<b>SmartFresh™</b> <b>SmartTabs</b>	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
--	---

**Active Ingredient:**

1-Methylcyclopropene.....0.63%

**Other Ingredients:** ..... 99.37%

**Total:** ..... 100.0%

**EPA REGISTRATION NO. 71297-3**

**EPA EST. NO. 707-WA-001**

**NOTICE:** Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

**Keep Out Of Reach Of Children**

## CAUTION

### FIRST AID

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 215-592-3000 for emergency medical treatment information.

**Net Contents:** 1 tablet, 0.044 ounces (1.25 g)



## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

## CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

#### User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.



## Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in the box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment area. Ventilation shall continue until after two hours of ventilation using fans or other mechanical ventilating systems or four hours of ventilation using vents, windows or other passive ventilation.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, prior to venting the volatile active ingredient from the treatment area is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

## Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

Do not enter enclosed areas until the enclosed area has been vented unless wearing the appropriate PPE. Ventilation shall continue until after thirty (30) minutes of ventilation using fans or other mechanical ventilating systems.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.



## DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

## GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the plant) and external sources of ethylene on fruit, vegetables, and ornamentals, including fresh cut flowers, potted flowers, bedding, nursery and foliage plants. By counteracting ethylene, SmartFresh™ provides many benefits to fruit, vegetables, and ornamentals during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury
- Reducing premature flower death in ornamentals
- Reducing premature leaf and flower drop and leaf yellowing in ornamentals

For fruit and vegetables, SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

For ornamentals, SmartFresh™ can be used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. SmartFresh™ is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions.



Harvested fruit and vegetables, and ornamentals must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

## **Fruit And Vegetables**

### **Storage Conditions**

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

### **Timing of Application**

SmartFresh™ can be added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. For best results, do not use with fruit previously treated with Ethephon. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. Fruit and vegetables may benefit from repeat application. It must be emphasized that maintaining the cold chain (keeping the fruit and vegetables cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

Apples: Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

Avocados: Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage. Only one application to the same fruit.

Bananas: Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

Broccoli: Apply SmartFresh™ as soon after harvest as possible.

Kiwifruit: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Persimmons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

Pears, Asian pears: Apply SmartFresh™ as soon after harvest as possible.

Peaches, nectarines, plums, plumcots, and apricots: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed.



## Cut Flowers, Potted Flowers, Bedding, Nursery and Foliage Plants

SmartFresh™ treatment benefits many flowers and plants such as:

Achillea, Aconitum, Agapanthus, Alchemilla, Allium, Alstroemeria, Alyssum, Aphelandra, Aquilegia, Asclepias, Astrantia, Asparagus fern, Azalea, Begonia, Bouvardia, Brassia (Schefflera), Brodiaea (Triteleia), Calathea, Campanula, Carnation, Celosia, Centaurea, Chamaedorea, Chelone, Coleus, Cordyline, Cymbidium, Crocosmia (Montbretia), Daucus (Queen Annes Lace), Delphinium, Dendrobium, Dianthus, Dicentra, Dizygotheca, Doronicum, Echium, Eremurus, Eustoma, (Lisianthus), Ficus, Freesia, Fuchsia, Geranium, Gladiolus, Godetia, Gypsophila, Hibiscus, Ilex (Holly), Impatiens, Ixia, Kalanchoe, Kniphofia, Lavatera, Lily, Lysimachia, Miniature Carnation, Monkshood, Pelargonium, Petunia, Philodendron, Phlox, Physostegia, Poinsettia, Radermachera, Rose, Rudbeckia, Salvia, Saponaria, Scabiosa, Silene, Snapdragon, Solidaster, Stock, Streptocarpus, Sweet William, Trachelium, Trollius, Veronica, Wax Flower, and Zygocactus.

### Timing of application

SmartFresh™ can be used just prior to harvest, immediately after harvest, just prior to shipment, upon arrival from the supplier, and/or just prior to sale. Flowers and plants can be treated whether or not they may have been previously treated with SmartFresh or another anti-ethylene product. Shipments already treated with SmartFresh™ do not have to be retreated. However, retreating is not harmful and can even be beneficial. Some species that would likely benefit from additional applications include those with more than one flower per stem (i.e. snapdragons, delphiniums, miniature carnations, and alstroemeria) and flowers at different stages of development on the same plant (i.e. geraniums, impatiens, and azaleas).

Plants being held for shipment in enclosed areas can be easily treated with SmartFresh™. For example, non-boxed sleeved potted plants and cut flowers (held dry or in solution), or boxed plants and cut flowers with the lids and/or precooling vents completely open and directly exposed to the surrounding atmosphere can be treated. Bedding or potted plants on movable racks are also easily treated.

### Application Method and Rate

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.



## Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of the EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height. For example, if the treatment area is 10 feet high x 20 feet long x 12 feet wide, the treatment volume would be  $10 \times 20 \times 12 = 2400$  cubic feet. To calculate the height measurement for greenhouses with a peaked roof, use one half of the sum of the height at the peak plus the height at the wall.

b.) Choose the correct number of **Green SmartFresh™ SmartTabs** according to the size of the area and the commodity to be treated as follows.

Apple, Asian pear, avocado, broccoli:

Use one GREEN tablet per 120 cubic feet of treatment area

Melon, tomato, kiwifruit, pear, peach, nectarine, plum, plumcot, apricot:

Use one GREEN tablet per 240 cubic feet of treatment area

Bananas: Use one GREEN tablet per 380 cubic feet of treatment area

Ornamentals:

Use one GREEN tablet per 150 cubic feet of treatment area

Never use more than ten (10) **Green SmartFresh™ SmartTabs** per activator kit. If more than ten (10) **Green SmartFresh™ SmartTabs** are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

**Always use two (2) Blue tablets for EACH Activator Kit.**

## Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container/Greenhouse

To be used with SmartFresh™, rooms/containers/trailers/greenhouses must be gas tight and have an internal fan for mixing the atmosphere.

### Check that:

- All room/trailer/container/greenhouse drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber      No large cracks
  - No plastic slat doors      No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

## Step 3: Fill the treatment room with the fruit, vegetables, or ornamentals to be tre



#### Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.  
**Always use both Blue tablets.**
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) May replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours for avocado, banana, broccoli, kiwifruit, melon, persimmon and tomato, fifteen (15) hours for Asian pear, twenty four (24) hours for apple, nectarine, peach, pear, plum, plumcot and apricot. Do not open the doors for AT LEAST four (4) hours for ornamentals treated at >55F and for at least ten (10) hours for ornamentals treated at or below 55F.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twenty four (24) hours.

#### Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated commodities not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

#### Restrictions

Do not split tablets. Use whole tablets only.

Do not smoke during the SmartFresh™ application.



#### **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Nonrefillable container. Do not reuse or refill this container. Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### **CONDITIONS OF SALE AND WARRANTY**

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

*SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company*

**AgroFresh Inc.**  
**A Fully-Owned Subsidiary of Rohm and Haas Company**  
**100 Independence Mall West**  
**Philadelphia, PA. 19106**  
**(215) 592-3000**





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OCT 17 2007

Ann Beaulieu  
Director of Regulatory Affairs  
AgroFresh, Inc.  
100 Independence Mall West  
Philadelphia, PA 19105

**Subject: SmartFresh™ SmartTabs**  
**EPA Registration No. 71297-3**  
**Label Amendment to add Non Agricultural Use Statement**  
**Application Date: August 24, 2007**

Dear Ms. Beaulieu:

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(5), is acceptable provided that you:

1. Submit and/or cite all data required for registration/re-registration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
2. Submit five (5) copies of your final printed labeling before you release the product for shipment. Final printed labeling means the label or labeling of the product when distributed or sold. Clearly legible reproductions or photo reductions will be accepted for unusual labels, such as those silk-screened directly onto glass or metal containers or large bags or drum labels.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

If you have any questions contact Driss Benmhend at 703-308-9525 or by e-mail at: Benmhend.driss@epa.gov.

A stamped copy of the label is enclosed for your records.

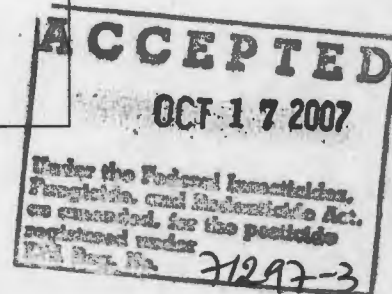
Sincerely,

A handwritten signature in black ink, appearing to read "Linda A. Hollis", is written over the typed name.

Linda A. Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution  
Prevention Division (7511P)



<b>SmartFresh™</b> <b>SmartTabs</b>	<b>AgroFresh Inc.</b> A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
--	--



**Active Ingredient:**

1-Methylcyclopropene..... 0.63%

**Other Ingredients:** ..... 99.37%

**Total:** ..... 100.0%

**EPA REGISTRATION NO. 71297-3**

**EPA EST. NO. 707-WA-001**

**NOTICE:** Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

**Keep Out Of Reach Of Children**

## CAUTION

### FIRST AID

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 215-592-3000 for emergency medical treatment information.

**Net Contents:** 10 tablets, 0.44 ounces (12.5 g)

SmartFresh™ SmartTab  
Last label revision October 10, 2007  
Page 1 of 10



## **PRECAUTIONARY STATEMENTS**

### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

## **CAUTION**

Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

### **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

#### **User Safety Recommendations**

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.



### Non-Agricultural Use Requirements

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170).

Do not enter enclosed areas until the enclosed area has been vented unless wearing the appropriate PPE. Ventilation shall continue until after thirty (30) minutes of ventilation using fans or other mechanical ventilating systems.

PPE required for early entry into enclosed areas prior to venting is:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G) or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N,R,P, or HE prefilter.

### DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling . Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

### GENERAL INFORMATION

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit or vegetable) and external sources of ethylene on harvested fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production

SmartFresh™ SmartTab  
Last label revision October 10, 2007  
Page 3 of 10



- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

### **Fruit And Vegetable Storage Conditions**

SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

### **Timing of Application**

SmartFresh™ can be added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit and vegetables cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

**Apples:** Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

**Avocados:** Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the "turning black" stage.

**Bananas:** Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

**Broccoli:** Apply SmartFresh™ as soon after harvest as possible.



Kiwifruit: Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed. Do not make more than one application to the same fruit.

Melons: Apply SmartFresh™ as soon after harvest as possible.

Persimmons: Apply SmartFresh™ as soon after harvest as possible.

Tomatoes: Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

### Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

Step 1: Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green** SmartFresh™ SmartTabs from Table 1 below according to the size of the area and the crop to be treated.



Table 1. Number of **Green SmartTabs** Required

Volume of Treatment Area ft <sup>3</sup>	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45

Never use more than ten (10) **Green SmartFresh™** SmartTabs per activator kit.

If more than ten (10) **Green SmartFresh™** SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

**Always use two (2) Blue tablets for EACH Release Kit.**



Table 1. Number of **Green SmartTabs** Required  
Continued

Volume of Treatment Area ft <sup>3</sup>	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green SmartFresh™ SmartTabs** per activator kit.

If more than ten (10) **Green SmartFresh™ SmartTabs** are needed, you must divide them among two (2) or more **SmartFresh™ Activator Kits**. Each Kit activates up to 10 **SmartFresh™ SmartTabs** only.

**Always use two (2) Blue tablets for EACH Release Kit.**

SmartFresh™ SmartTab  
Last label revision October 10, 2007  
Page 7 of 10



## Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

### Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber      No large cracks
  - No plastic slat doors      No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.  
**Always use both Blue tablets.**
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose



of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated fruit and vegetables not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

### **Restrictions**

**Maximum season use rate:** One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald.

Do not treat fruit that have had a pre-harvest application of ethephon.

### **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### **CONDITIONS OF SALE AND WARRANTY**

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

*SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company*

**AgroFresh Inc.**

SmartFresh™ SmartTab  
Last label revision October 10, 2007  
Page 9 of 10



**A Fully-Owned Subsidiary of Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, PA. 19106  
(215) 592-3000**

SmartFresh™ SmartTab  
Last label revision October 10, 2007  
Page 10 of 10



# Receipt for Section 3

S: 815017	Regulation: <input type="radio"/> Yes <input checked="" type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>
Regulatory Type: Product Registration - Section 3	Fee For Service: <input type="radio"/> Yes <input checked="" type="radio"/> No	
Application Type: Amendment	Billable: <input type="radio"/> Yes <input checked="" type="radio"/> No	
Company: 71297 AGRO FRESH INC.	V	
Risk Manager: Biologicals & Pollution Prevention Division, PM Team 90		
Product #: 71297-3	Product Name: SMARTFRESH SMARTTABS	
Me Too Section3:	Me Too Product Name:	
Application Date: 07-Aug-2007	OPP Rec'd Date: 13-Aug-2007	<div>Receipt Content</div>
Front End Date: 15-Aug-2007	Risk Manager Send Date: 23-Aug-2007	
FFS Due Date:	Negotiated Due Date:	
OPP Target Date:		
Fast Track: <input type="checkbox"/>	New ingredient: <input type="checkbox"/>	
Receipt Description:		
REVISED LABEL		
AUG 25 2007		
New Ingredient Request Date:		
New Ingredient Received Date:		

EPA-PRISM Main - Cont...

9:25 AM

FAST TEAM  
300  
AUG 27 2007  
Todd

2-label  
submitted

AIO-Chris  
AUG 28 2007  
sdh





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

August 23, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

ANN BEAULIEU  
AGRO FRESH INC.  
C/O ROHM AND HAAS COMPANY  
100 INDEPENDENCE MALL WEST  
PHILADELPHIA, PA 19105

PRODUCT NAME: SMARTFRESH SMARTTABS  
COMPANY NAME: AGRO FRESH INC.  
EPA FILE SYMBOL: 71297-3  
EPA RECEIPT DATE: 08/13/07

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Biologicals & Pollution Prevention Division, PM Team 90, at (703) 308-8712.

Sincerely *J. Wise*  
Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division



# Receipt for Section 3

S: 815017	Resubmission: <input type="radio"/> Yes <input checked="" type="radio"/> No	<div>Print Letter</div> <div>Enter More Information</div> <div>Tracking</div>
Regulatory Type: Product Registration - Section 3	Fee For Service: <input checked="" type="radio"/> Yes <input type="radio"/> No	
Application Type: Amendment	Billable: <input checked="" type="radio"/> Yes <input type="radio"/> No	
Company: 71297 AGRO FRESH INC.	V	
Risk Manager: Biologicals & Pollution Prevention Division, PM Team 90		
Product #: 71297-3	Product Name: SMARTFRESH SMARTABS	
Internet:		
Me Too Section3:	Me Too Product Name:	
Application Date: 07-Aug-2007	OPP Rec'd Date: 13-Aug-2007	Receipt Content
Front End Date: 15-Aug-2007	Risk Manager Send Date:	
FFS Due Date:	Negotiated Due Date:	
OPP Target Date:		
Fast Track: <input type="checkbox"/>	New Ingredient: <input type="checkbox"/>	
Receipt Description:		
REVISED LABEL		



# Fee for Service

{815017Ê~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: \_\_\_\_

for Division

☐ AD

☒ BPPD

☐ RD

Risk Mgr.

91

Receipt No.

S-

815017

EPA File Symbol/Reg. No.

71297-3

Pin-Punch Date:

8/13/2007

☒ This item is NOT subject to FFS action.

## Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

## Parent/Child Decisions:

☐ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: Todd Peterson

Date: 8/16/07

Remarks: Fast Track Amendment





United States  
**Environmental Protection Agency**  
Washington, DC 20460

Registration

OPP Identifier Number

X

Amendment

Other

**Application for Pesticide - Section I**

1. Company/Product Number agroFresh, Inc. / 71297-3	2. EPA Product Manager Driss Benmhend	3. Proposed Classification  None X Restricted
4. Company/Product (Name) SmartFresh™ SmartTab	PM#	
5. Name and Address of Applicant (Include Zip Code) agroFresh Inc./Rohm and Haas Company 100 Independence Mall West Philadelphia, PA 19106-2399		6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No.  Product Name

**Section - II**

Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
Notification - Explain below.	<input type="checkbox"/> "Me Too" Application. Other - Explain below.

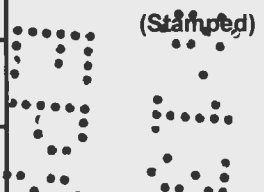

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

As requested, the Worker Protection Standard language is updated.

**Section - III**

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	If "Yes" Unit Packaging wgt.		If "Yes" Package wgt
	No. per container	No. per container	
<b>Certification must be submitted</b>	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Blister Pack		
	3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		
4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		Other _____	

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann Beaulieu	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) 215-619-5534
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received  
Signature 	Director, Regulatory Affairs	
Typed Name Ann Beaulieu	5. Date August 7, 2007	



**EPA Registration Number:** 71297-2  
**Product Name:** SmartFresh™ Technology

- Completed EPA Form 8570-1
- Proposed revised label with changes highlighted in red
- Proposed revised label
- Electronic revised label: 071297-00002.20070808.SmartFresh.pdf

Revision: The Worker Protection Standard language has been deleted.

Rationale: Per 40 CFR 170.102, the Worker Protection Standard "*applies when any pesticide product is used on an agricultural establishment in the production of agricultural plants.*" 71297-2 is not used in the production of agricultural plants; it is used after harvest on the harvested portion of the plant. It falls under the exemption 170.103 (i):

*"This part does not apply when any pesticide is applied on an agricultural establishment in the following circumstances: (i) On the harvested portions of agricultural plants..."*

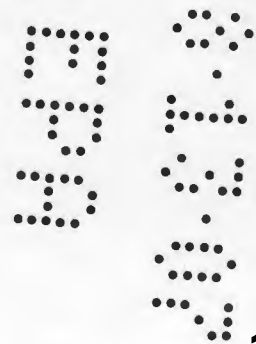
**EPA Registration Number:** 71297-3  
**Product Name:** SmartFresh™ SmartTab

- Completed EPA Form 8570-1
- Proposed revised label with changes highlighted in red
- Proposed revised label
- Electronic revised label: 071297-00003.20070808.SmartTab.pdf

Revision: The Worker Protection Standard language has been deleted.

Rationale: Per 40 CFR 170.102, the Worker Protection Standard "*applies when any pesticide product is used on an agricultural establishment in the production of agricultural plants.*" 71297-3 is not used in the production of agricultural plants; it is used after harvest on the harvested portion of the plant. It falls under the exemption 170.103 (i):

*"This part does not apply when any pesticide is applied on an agricultural establishment in the following circumstances: (i) On the harvested portions of agricultural plants..."*





**EPA Registration Number:** 71297-4  
**Product Name:** Manufacturing-Use Product-SF

- Current label enclosed

No change is submitted for EPA Registration Number 71297-4 because it is a Manufacturing Use Product and does not meet the requirement of the Worker Protection Standard. There is no Worker Protection Standard language on the current label.

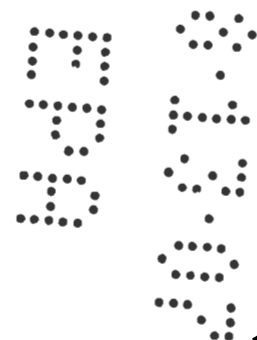
I hope that this response clarifies the labeling of 71297-1, 2 3, and 4. If you have any further questions, I can be contacted at 215-619-5534 or [abeaulieu@agrofresh.com](mailto:abeaulieu@agrofresh.com).  
Thank you.

Sincerely,



Ann Beaulieu  
Director, Regulatory Affairs

Enclosures, including multiple cover letters  
Three CD's





August 10, 2007

Document Processing Desk (AMEND)  
**Office of Pesticide Programs (7504P)**  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Re: US EPA request for amended labels for  
EPA Registration Numbers 71297-1, 2, 3, and 4  
Active Ingredient = 1-Methylcyclopropene

AgroFresh, Inc. was contacted by the U.S. EPA with a request to review and update the ventilation and Worker Protection Standard language of EPA Registration Numbers 71297-1, 2, 3 and 4. The electronic versions of the three revised labels are included on the enclosed CD's using the new format prescribed by EPA. These edited versions incorporate previously submitted notifications.

In addition, enclosed is the following for each label:

**EPA Registration Number:** 71297-1  
**Product Name:** EthylBloc™

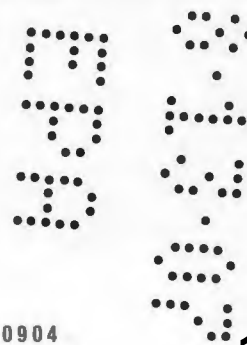
- Completed EPA Form 8570-1
- Proposed revised label with changes highlighted in red
- Proposed revised label
- Electronic revised label: 071297-00001.20070730.EthylBloc.pdf

Revision: Added specific venting instructions to Worker Protection Standard language.

Rationale: The amended ventilation and Worker Protection Standard language recently approved for 71297-5 is appropriate for the label uses of 71297-1.

**AgroFresh** Inc.

727 Norristown Road, P.O. Box 904, Spring House, PA 19477-0904  
www.smartfresh.com • (TEL) 215-641-7000 • (FAX) 215-619-1646





<b>SmartFresh™</b> <b>SmartTabs</b>	AgroFresh Inc. A subsidiary of Rohm and Haas Company Philadelphia, PA. 19106 Tel: (215) 592-3000
--	---

**Active Ingredient:**

1-Methylcyclopropene..... 0.63%

**Other Ingredients:** ..... 99.37%

**Total:** ..... 100.0%

**EPA REGISTRATION NO. 71297-3**

**EPA EST. NO. 707-WA-001**

**NOTICE:** Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

**Keep Out Of Reach Of Children**

## CAUTION

### FIRST AID

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 215-592-3000 for emergency medical treatment information.

**Net Contents:** 10 tablets, 0.44 ounces (12.5 g)

SmartFresh™ SmartTab  
Last label revision August 8, 2007  
Page 1 of 10



## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

## CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

#### User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.



## **DIRECTIONS FOR USE**

It is a violation of federal law to use this product in a manner inconsistent with its labeling . Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

## **GENERAL INFORMATION**

SmartFresh™ is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit or vegetable) and external sources of ethylene on harvested fruit and vegetables. By counteracting ethylene, SmartFresh™ provides many benefits to the fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity
- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

SmartFresh™ can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. SmartFresh™ is effective under both cool (below 55 °F, 13 °C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of SmartFresh™ in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce SmartFresh™'s effectiveness.

## **Fruit And Vegetable Storage Conditions**



SmartFresh™ is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. SmartFresh™ must be used in air tight storage areas.

### Timing of Application

SmartFresh™ can be added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit and vegetables cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

**Apples:** Apply SmartFresh™ soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store apples that are to be held longer than six months in a controlled atmosphere.

**Avocados:** Apply SmartFresh™ to the fruit soon after harvest at the physiological maturity stage or just prior to the “turning black” stage.

**Bananas:** Apply SmartFresh™ after the bananas have been exposed to ethylene and prior to reaching color stage 4.

**Broccoli:** Apply SmartFresh™ as soon after harvest as possible.

**Kiwifruit:** Apply SmartFresh™ either as soon after harvest as possible or after long term storage and before the fruit are transported and distributed. Do not make more than one application to the same fruit.

**Melons:** Apply SmartFresh™ as soon after harvest as possible.

**Persimmons:** Apply SmartFresh™ as soon after harvest as possible.

**Tomatoes:** Apply SmartFresh™ between color stage mature green (Color Stage 1) and light red (Color Stage 5).

### Application Method

Prior to application, ensure that the treatment area can be properly and promptly sealed following application. SmartFresh™ SmartTabs are used in conjunction with the SmartFresh™ Activator Kit. SmartFresh™ SmartTabs are **Green** tablets that, when mixed with **Blue** Activator Tablets in a proprietary Activator Solution, release the volatile active ingredient 1-methylcyclopropene (1-MCP). Make sure that you have a sufficient supply of both SmartFresh™ SmartTabs and SmartFresh™ Activator Kits available to treat your selected treatment area.

**Step 1:** Selection of the appropriate number of SmartTabs and SmartTab Activator Kits for use

SmartFresh™ SmartTab  
Last label revision August 8, 2007  
Page 4 of 10



a.) Accurately determine the volume of your EMPTY treatment area in cubic feet. Multiply inside dimensions: volume = length X width X height.

b.) Choose the correct number of **Green SmartFresh™** SmartTabs from Table 1 below according to the size of the area and the crop to be treated.

Table 1. Number of **Green SmartTabs** Required

Volume of Treatment Area ft <sup>3</sup>	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45



Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit. If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

**Always use two (2) Blue tablets for EACH Release Kit.**



Table 1. Number of **Green** SmartTabs Required  
Continued

Volume of Treatment Area ft <sup>3</sup>	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) **Green** SmartFresh™ SmartTabs per activator kit.

If more than ten (10) **Green** SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

**Always use two (2) Blue tablets for EACH Release Kit.**



## Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

### Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber      No large cracks
  - No plastic slat doors      No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables to be treated

Step 4: Release of 1-MCP

- a) Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block.  
**Always use both Blue tablets.**
- b) Remove the appropriate number of **Green** SmartTabs from the SmartFresh™ SmartTabs Package.
- c) Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- d) Add both the **Blue** and **Green** Tablets to the Activator Solution.
- e) Replace the cap.
- f) Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- g) Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- h) Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- i) Do not open the doors for AT LEAST twelve (12) hours.
- j) For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room venting, remove the SmartFresh™ Activator Solution and dispose



of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated fruit and vegetables not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

### Restrictions

**Maximum season use rate:** One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald.

Do not treat fruit that have had a pre-harvest application of ethephon.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

### CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its chemical description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE.** Handling, storage and use of the product by Buyer or User are beyond the control of AgroFresh Inc. and Seller. Risks such as crop injury, ineffectiveness or other unintended consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer or User. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE HELD LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT**

*SmartFresh™ is a registered trademark of AgroFresh, Inc./Rohm and Haas Company*

**AgroFresh Inc.**

SmartFresh™ SmartTab  
Last label revision August 8, 2007  
Page 9 of 10



**A Fully-Owned Subsidiary of Rohm and Haas Company**  
**100 Independence Mall West**  
**Philadelphia, PA. 19106**  
**(215) 592-3000**



Ms. Ann Hecht Beaulieu  
Regulatory Director, AgroFresh, Inc.  
AgroFresh Inc./ Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, PA 19106-2399

JUL 09 2007

Subject: Application to Amend EthylBloc Sachet Label to Clarify Use  
Directions and Modify Worker Protection Standard Labeling  
EPA Registration No. 71297-5

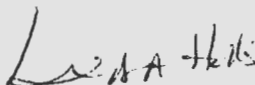
Dear Ms. Beaulieu:

The labeling referred to above, submitted in connection with registration under Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable and a stamped copy of the label is enclosed for your records. Submit five (5) copies of your final printed labeling before you release the amended product for shipment.

We note that your other 1-methylcyclopropene products' labeling needs to be updated to modify the ventilation and Worker Protection Standard language. Please submit appropriate amendment applications for EPA Registration Numbers 71297-1, -2, -3, and -4.

Should you have any follow-up questions, please do not hesitate to contact Mike Mendelsohn at [mendelsohn.mike@epa.gov](mailto:mendelsohn.mike@epa.gov) or (703) 308-8715 or Driss Benmhend at [benmhend.driss@epa.gov](mailto:benmhend.driss@epa.gov) or (703) 308-9525.

Sincerely,



Linda Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution  
Prevention Division (7511P)

cc: Driss Benmhend

EPA Reg. No. Files for 71297-1, -2, -3, -4



## ROUTING &amp; TRANSMITTAL SLIP

6/14/07

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

Todd Peterson

TP

6/12/07

Linda Hollis

LH

7.9.07

Mike Mendelsohn

Action	File	Note And Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	X Signature
Coordination	Justify	Concurrence

## REMARKS

This fast-track label amendment was prompted by a 12/4/06 SLITS inquiry from New York regarding WPS uses and PPE (attached). In a May 10, 2007 meeting between Chris Pfeifer, Mike Mendelsohn, Jim Downing, Richard Mont (OPP/FEAD) and David Stangle (OECA); it was determined that all uses of this product's label are subject to the WPS, except for the cut flower uses. Further, in light of 40 CFR 170.110.3, additional ventilation language was necessary. Communications with Dr. Russel Jones confirmed that 2 hours mechanical ventilation or 4 hours passive ventilation are adequate for this product. Additionally, Dr. Jones indicated that oxygen displacement was not an issue for this product and that it was unclear why PPE included respirators. Ann Beaulieu of AgroFresh indicated that they wanted the respirators as an extra precaution.

It appears other 1-MCP products are not properly labeled for WPS and ventilation. The label amendment notes this and request submission of amendments to those products. Additionally, the New York SLITS response could be amended once this label amendment is approved to reflect the changes made.

FROM: (Name, org. symbol, Agency/Post)

Room No.-Bldg.

Mike Mendelsohn

Phone No

308-8715



# Receipt for Section 3

S: 811082	Regulatory Type: Product Registration - Section 3	Application Type: Miscellaneous Receipt	Company: 71297 AGRO FRESH INC.	Risk Manager: Biologicals & Pollution Prevention Division, PM Team 90
Product #: 71297-3	Product Name: SMARTFRESH SMARTABS	Me Too Section3:	Me Too Product Name:	
Application Date: 24-May-2007	OPP Rec'd Date: 29-May-2007	Front End Date: 29-May-2007	Risk Manager Send Date: 01-Jun-2007	
FFS Due Date:	Negotiated Due Date:	OPP Target Date:		
Fast Track:	Receipt Description: final printed labels.	<div style="border: 1px solid black; padding: 5px; text-align: center;"> JUN 01 2007 BPPD </div>		

Print Letter  
Enter More Information  
Tracking

Welcome - Lotus N... BPPD EPA-PRISM Main 10:09 AM

400 Final Printed Label = Carole

↓  
6/11/07  
LC

AIO - Carole  
JUN 12 2007  
sdh

CP  
JUN 15 2007  
LAG - 10/17/07  
2/22/06 FPL for this date



May 24, 2007

Mr. Driss Benmhend  
Office of Pesticide Programs (7511P)  
Biopesticides and Pollution Prevention Division  
U.S. Environmental Protection Agency  
One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501


Dear Mr. Benmhend:

Re: SmartFresh™ SmartTabs  
EPA Registration Number 71297-3  
Submission of final printed label

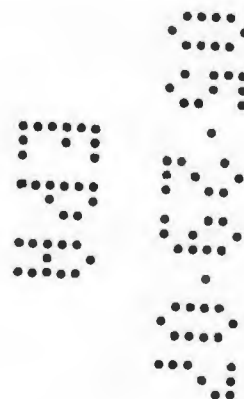
Enclosed are five (5) copies of the final printed SmartFresh™ SmartTabs label that includes persimmon. The amendment to include persimmon was accepted on March 22, 2006 in accordance with FIFRA section 3(c)(7)(A).

If you have any questions, please let me know. Thank you.

Sincerely,

  
Ann Beaulieu, Ph.D.  
Director, Regulatory Affairs

enclosure



**AgroFresh**



05.29.07

EPA

# CONDITIONS OF SALE AND WARRANTY

AgroFresh Inc. warrants that the product conforms to its label description and is reasonably fit for the purpose stated on the label only when used in accordance with label directions under normal conditions of use. AgroFresh Inc. **MAKES NO OTHER EXPRESS OR IMPLIED WARRANTIES EITHER OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.** Handling, storage and use of the product by Buyer are beyond the control of AgroFresh Inc. and risks such as crop injury, ineffectiveness or other undesired consequences resulting from, but not limited to, weather or soil conditions, presence of other materials, disease, pests, drift to other crops or property, or failure to follow label directions will be assumed by the Buyer. **TO THE FULLEST EXTENT PERMITTED BY LAW, AgroFresh Inc. OR SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR PUNITIVE DAMAGES RESULTING FROM THE HANDLING, STORAGE OR USE OF THIS PRODUCT.**

SmartFresh™ is a registered trademark of AgroFresh, Inc. and Haas Company

AgroFresh Inc.  
Fully-Owned Subsidiary of Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, PA. 19106  
(215) 592-3000

## NOTES

SmartFresh™  
SmartTabs

AgroFresh Inc.  
A subsidiary of Rohm and Haas Company  
Philadelphia, PA 19106  
Tel: (215) 592-3000

### Active Ingredient:

1-Methylcyclopropene..... 0.63%

Other Ingredients: ..... 99.37%

Total: ..... 100.0%

EPA REGISTRATION NO. 71297-3

EPA EST. NO. 707-WA-001

**NOTICE:** Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not acceptable, return the product and its generating system unopened and unused within thirty days of purchase to the place of purchase.

## KEEP OUT OF REACH OF CHILDREN CAUTION

### FIRST AID

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 215-592-3000 for emergency medical treatment information.

Net Contents: 10 tablets (12.5 g)

11

12

file: 9375-1\_book\_art  
folder: 9375-1\_R&H\_SmartFresh  
color: black

created: 6-29-06 bm  
alt:  
size: 3"(w) x 5.875"(h)



70.02.30

093



05.29.07

07A

s that are to be held longer than six months in a  
lled atmosphere.

ados: Apply SmartFresh™ to the fruit soon after  
st at the physiological maturity stage or just prior to  
urning black" stage.

nas: Apply SmartFresh™ after the bananas have  
exposed to ethylene and prior to reaching color  
4.

oli: Apply SmartFresh™ as soon after harvest as  
le.

uit: Apply SmartFresh™ either as soon after har-  
s possible or after long term storage and before the  
re transported and distributed. Do not make more  
ne application to the same fruit.

s: Apply SmartFresh™ as soon after harvest as  
le.

mons: Apply SmartFresh™ as soon after harvest  
ssible.

atoes: Apply SmartFresh™ between color stage  
e green (Color Stage 1) and light red (Color Stage 5).

#### ication Method

o application, ensure that the treatment area can be  
rly and promptly sealed following application.  
Fresh™ SmartTabs are used in conjunction with  
SmartFresh™ Activator Kit. SmartFresh™  
Tabs are Green tablets that, when mixed with Blue  
tor Tablets in a proprietary Activator Solution,  
e the volatile active ingredient 1-methylcyclo-  
ne (1-MCP). Make sure that you have a sufficient  
y of both SmartFresh™ SmartTabs and  
Fresh™ Activator Kits available to treat your  
ed treatment area.

: Selection of the appropriate number of  
SmartTabs and SmartTab Activator Kits for use

a.) Accurately determine the volume of your  
EMPTY treatment area in cubic feet. Multiply inside  
dimensions: volume = length X width X height.

b.) Choose the correct number of Green  
SmartFresh™ SmartTabs from Table 1 below  
according to the size of the area and the crop to  
be treated.

Table 1. Number of Green SmartTabs Required

Volume of Treatment Area ft <sup>3</sup>	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
706 to 882	2	3	6
883 to 1058	3	4	8
1059 to 1235	3	5	9
1236 to 1412	4	6	11
1413 to 1588	4	6	12
1589 to 1765	5	7	14
1766 to 1941	5	8	15
1942 to 2118	5	9	17
2119 to 2294	6	9	19
2295 to 2471	6	10	20
2472 to 2648	7	11	22
2649 to 2824	7	12	23
2825 to 3001	8	12	25
3002 to 3177	8	13	26
3178 to 3354	9	14	28
3355 to 3530	9	15	29
3531 to 3707	9	15	31
3708 to 3884	10	16	32
3885 to 4060	10	17	34
4061 to 4237	11	18	36
4238 to 4413	11	18	37

Never use more than ten (10) Green SmartFresh™  
SmartTabs per activator kit.

If more than ten (10) Green SmartFresh™ SmartTabs are  
needed, you must divide them among two (2) or more  
SmartFresh™ Activator Kits. Each Kit activates up to 10  
SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

6

(continued)

Table 1. Number of Green SmartTabs Required (continued)

Volume of Treatment Area ft <sup>3</sup>	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
4414 to 4590	12	19	39
4591 to 4766	12	20	40
4767 to 4943	13	21	42
4944 to 5120	13	21	43
5121 to 5296	14	22	45
5297 to 5473	14	23	46
5474 to 5649	14	24	48
5650 to 5826	15	24	49
5827 to 6002	15	25	51
6003 to 6179	16	26	53
6180 to 6356	16	27	54
6357 to 6532	17	27	56
6533 to 6709	17	28	57
6710 to 6885	18	29	59
6886 to 7062	18	30	60
7063 to 7239	18	30	62
7240 to 7415	19	31	63
7416 to 7592	19	32	65
7593 to 7768	20	33	67
7769 to 7945	20	33	68
7946 to 8121	21	34	70

Never use more than ten (10) Green SmartFresh™  
SmartTabs per activator kit.

If more than ten (10) Green SmartFresh™ SmartTabs are  
needed, you must divide them among two (2) or more  
SmartFresh™ Activator Kits. Each Kit activates up to 10  
SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit.

7

(continued)



*Final Printed Label  
received but not  
reviewed. Cp 11/30/08*

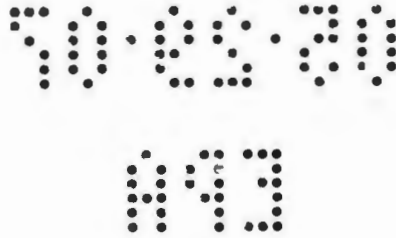


Table 1. Number of Green SmartTabs Required (continued)

Volume of Treatment Area ft <sup>2</sup>	Banana	Melon Tomato Kiwi Persimmon	Apple Avocado Broccoli
8122 to 8298	21	35	71
8299 to 8475	22	36	73
8476 to 8651	22	37	74
8652 to 8828	23	37	76
8829 to 9004	23	38	77
9005 to 9181	23	39	79
9182 to 9357	24	39	80
9358 to 9534	24	40	82
9535 to 9711	25	41	84
9712 to 9887	25	42	85
9888 to 10064	26	42	87
10065 to 10240	26	43	88
10241 to 10417	27	44	90
10418 to 10593	27	45	91
10594 to 10770	27	45	93
10771 to 10947	28	46	94

Never use more than ten (10) Green SmartFresh™ SmartTabs per activator kit.

If more than ten (10) Green SmartFresh™ SmartTabs are needed, you must divide them among two (2) or more SmartFresh™ Activator Kits. Each Kit activates up to 10 SmartFresh™ SmartTabs only.

Always use two (2) Blue tablets for EACH Release Kit. Step 2. Evaluation Of The Quality Of The Treatment Room / Trailer / Container

To be used with SmartFresh™, rooms/containers/trailers must be gas tight and have an internal fan for mixing the atmosphere.

#### Check that:

- All Room/Trailer/Container drain holes are plugged
- There are no holes in the walls, ceiling, or floor
- All vents to outside air are closed
- When viewed from a dark interior, no outside light is visible
- Door seals are in EXCELLENT condition
  - No missing rubber
  - No large cracks
  - No plastic slat doors
  - No roller top doors
  - No side doors
- Scrubbers and/or ozone generators are off

Step 3: Fill the treatment room with the fruit or vegetables to be treated

Step 4: Release of 1-MCP

- Remove the pack of two (2) Blue SmartFresh™ Activator Tablets from the foam block. **Always use both Blue tablets.**
- Remove the appropriate number of Green SmartTabs from the SmartFresh™ SmartTabs Package.
- Peel off the foil seal from the SmartFresh™ Activator Solution taking care not to spill the solution.
- Add both the Blue and Green Tablets to the Activator Solution.
- Replace the cap.
- Place the small container on a level surface e.g. in the bottom gap of the pallet. Keep the container upright.
- Exit the treatment room immediately and promptly close the doors and ensure they are tightly sealed in order to contain the SmartFresh™ and ensure its maximum efficacy. The release of SmartFresh™ to the area will start several minutes after addition of the SmartTabs to the Activator Solution.
- Circulate air in the room by means of the internal air circulation system for AT LEAST one (1) hour.
- Do not open the doors for AT LEAST twelve (12) hours.
- For controlled atmosphere storage containers or storage rooms, do not change the room atmosphere to controlled atmosphere conditions for AT LEAST twelve (12) hours.

Step 5: Reentry To The Storage Area

At the end of the SmartFresh™ treatment period, vent the treated room by opening the doors for a minimum of thirty minutes with continued full internal ventilation before allowing workers to enter. At the end of the room

venting, remove the SmartFresh™ Activator Solution and dispose of it as non-hazardous waste on-site or at an approved waste disposal facility. Store treated fruit and vegetables not intended for immediate sale according to standard commercial practices, in either refrigerated air or controlled atmosphere conditions.

#### Restrictions

**Maximum season use rate:** One application with appropriate number of tablets

Do not smoke during the SmartFresh™ application.

Do not treat fruit or vegetables stressed from poor fertility, heat, drought or sunscald.

Do not treat fruit that have had a pre-harvest application of ethephon.

#### STORAGE AND DISPOSAL

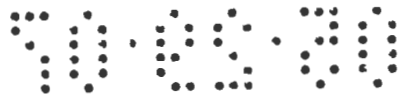
Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original packaging in a cool, dry place.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Disposal:** Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.





## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION

Causes slight eye irritation. Harmful if absorbed through skin. Harmful if inhaled. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators of this product must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Safety glasses or goggles

#### USER SAFETY RECOMMENDATIONS

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Applicators and handlers must follow manufacturer's instructions for cleaning / maintaining PPE. If no such instructions exist for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

#### DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the State or Tribal Agency responsible for pesticide regulation. All applicable directions, restrictions, precautions and conditions of sale and warranty are to be followed. This labeling must be in the user's possession during application.

#### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Workers Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas prior to venting the volatile active ingredient from the treatment room and during the REI of 30 minutes after the room has been vented.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, prior to venting the volatile active ingredient from the treatment room is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks
- Respirator with an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any N, R, P, or HE prefilter.

#### GENERAL INFORMATION

**SmartFresh™** is a unique postharvest tool for counteracting many of the undesirable effects of both internal (produced within the fruit or vegetable) and external sources of ethylene on harvested fruit and vegetables. By counteracting ethylene, **SmartFresh™** provides many benefits to the fruit and vegetables during transport and storage including:

- Maintaining firmness
- Maintaining titratable acidity

- Preventing superficial scald and soft scald on apples
- Reducing internal ethylene production
- Protection from external sources of ethylene
- Reducing respiration
- Delaying ripening and senescence
- Reducing incidence of peel greasiness in apples
- Reducing incidence of core flush and mealiness in apples
- Reducing chilling injury

**SmartFresh™** can be used immediately after harvest, prior to storage, prior to shipment or just prior to sale. **SmartFresh™** is effective under both cool (below 55°F, 13°C) and warm (above 55°F, 13°C) temperature conditions. To realize maximum benefit in controlling senescence, treat fruits and vegetables as soon as possible after harvest.

Harvested fruit and vegetables must be exposed to the volatile active ingredient of **SmartFresh™** in enclosed areas, such as storage rooms, greenhouses, coolers, shipping containers, enclosed truck trailers, or ambient temperature, refrigerated, or controlled atmosphere food storage facilities. This product is not intended for use outdoors or in other non-enclosed areas. These enclosed treatment areas must be gas tight as leakage will reduce **SmartFresh™**'s effectiveness.

#### Fruit And Vegetable Storage Conditions

**SmartFresh™** is compatible with and complementary to both controlled atmosphere and regular air fruit and vegetable storage conditions. **SmartFresh™** must be used in air tight storage areas.

#### Timing of Application

**SmartFresh™** can be added to the storage area containing fruit or vegetables immediately after harvest, upon entering storage, during distribution or in transit. After application, fruit or vegetables not for immediate sale must be stored according to good standard commercial practices. It must be emphasized that maintaining the cold chain (keeping the fruit and vegetables cool at all times) and strict adherence to phytosanitary practices remain essential in maintaining safe and high quality fruit and vegetables.

**Apples:** Apply **SmartFresh™** soon after harvest. Best results are obtained when fruit is at the optimum maturity level for long term storage. For optimum quality, store